

Case: Farah Jean Francois

Total Hours by Attorney

| Attorney | Rates | Total Hours | Fees Earned | Fees Cut | Fees Sought |
|--------------------|---------------|---------------|-------------------|--------------------|-------------------|
| Para by Atty | 126.47 | 10.40 | 1,130.00 | | 1,130.00 |
| A. Keshavarz | 550.00 | 448.10 | 246,455.00 | (22,750.00) | 223,705.00 |
| E. Catherine | 350.00 | 318.13 | 111,345.50 | (4,275.00) | 107,070.50 |
| N. Moore | 100.00 | 71.50 | 7,150.00 | (2,360.00) | 4,790.00 |
| J. Miller | 375.00 | 126.10 | 47,287.50 | (23,715.00) | 23,572.50 |
| Grand Total | 409.21 | 974.23 | 413,368.00 | (53,100.00) | 360,268.00 |

The Law Office of Ahmad Keshavarz

Case: Farah Jean Francois

Per Attorney Hours by Topic

| Task | Hours Worked | Amount Earned | Cut Amount | Amount Sought |
|------------------------|---------------|------------------|--------------------|------------------|
| Other | 12.20 | 6,190.00 | | 6,190.00 |
| A. Keshavarz | 9.60 | 5,280.00 | | 5,280.00 |
| E. Catherine | 2.60 | 910.00 | | 910.00 |
| AC | 17.30 | 8,110.00 | | 8,110.00 |
| Para by Atty | 0.50 | 50.00 | | 50.00 |
| A. Keshavarz | 10.90 | 5,995.00 | | 5,995.00 |
| E. Catherine | 5.90 | 2,065.00 | | 2,065.00 |
| Complaint | 26.10 | 10,680.00 | | 10,680.00 |
| Para by Atty | 1.10 | 110.00 | | 110.00 |
| A. Keshavarz | 9.10 | 5,005.00 | | 5,005.00 |
| E. Catherine | 15.90 | 5,565.00 | | 5,565.00 |
| Depositions | 175.80 | 80,220.00 | (15,595.00) | 64,625.00 |
| Para by Atty | 0.60 | 60.00 | | 60.00 |
| A. Keshavarz | 94.20 | 51,810.00 | (12,650.00) | 39,160.00 |
| E. Catherine | 81.00 | 28,350.00 | (2,945.00) | 25,405.00 |
| Discovery | 91.30 | 41,360.00 | | 41,360.00 |
| Para by Atty | 2.70 | 270.00 | | 270.00 |
| A. Keshavarz | 50.40 | 27,720.00 | | 27,720.00 |
| E. Catherine | 38.20 | 13,370.00 | | 13,370.00 |
| Fee Petition | 100.70 | 42,067.50 | (15,867.50) | 26,200.00 |
| A. Keshavarz | 24.60 | 13,530.00 | (1,540.00) | 11,990.00 |
| J. Miller | 76.10 | 28,537.50 | (14,327.50) | 14,210.00 |
| MSJ | 159.13 | 67,260.50 | (1,100.00) | 66,160.50 |
| Para by Atty | 3.90 | 390.00 | | 390.00 |
| A. Keshavarz | 62.70 | 34,485.00 | (1,100.00) | 33,385.00 |
| E. Catherine | 92.53 | 32,385.50 | | 32,385.50 |
| MTD | 59.60 | 26,410.00 | | 26,410.00 |
| Para by Atty | 1.40 | 140.00 | | 140.00 |
| A. Keshavarz | 29.50 | 16,225.00 | | 16,225.00 |
| E. Catherine | 28.70 | 10,045.00 | | 10,045.00 |
| Reconsideration | 15.70 | 7,395.00 | | 7,395.00 |
| A. Keshavarz | 9.50 | 5,225.00 | | 5,225.00 |
| E. Catherine | 6.20 | 2,170.00 | | 2,170.00 |
| Settlement | 63.40 | 29,045.00 | (3,447.50) | 25,597.50 |
| A. Keshavarz | 42.00 | 23,100.00 | (750.00) | 22,350.00 |
| E. Catherine | 9.50 | 3,325.00 | (1,330.00) | 1,995.00 |
| N. Moore | 6.70 | 670.00 | (430.00) | 240.00 |
| J. Miller | 5.20 | 1,950.00 | (937.50) | 1,012.50 |
| Trial | 253.00 | 94,630.00 | (17,090.00) | 77,540.00 |
| Para by Atty | 0.20 | 110.00 | | 110.00 |
| A. Keshavarz | 105.60 | 58,080.00 | (6,710.00) | 51,370.00 |
| E. Catherine | 37.60 | 13,160.00 | | 13,160.00 |
| N. Moore | 64.80 | 6,480.00 | (1,930.00) | 4,550.00 |
| (blank) J. Miller | 44.8 | 16,800.00 | (\$8,450) | 8,350.00 |

| | | | | |
|--------------------|---------------|-------------------|--------------------|-------------------|
| Grand Total | 974.23 | 413,368.00 | (53,100.00) | 360,268.00 |
|--------------------|---------------|-------------------|--------------------|-------------------|

| Date | Name | Topic | Notes | Hours | Rate | Amount | Cut | Adjusted Fee |
|------------|--------------|-----------|--|-------|------|----------|-----|--------------|
| 06/10/2021 | A. Keshavarz | Other | Preliminary call with client. | 0.30 | 550 | 165.00 | | 165.00 |
| 06/11/2021 | A. Keshavarz | Discovery | Initial consultation,. Pre- and post- consultation document review, claim analysis, issue spotting. | 3.10 | 550 | 1,705.00 | | 1,705.00 |
| 06/15/2021 | A. Keshavarz | Other | Call from client. | 0.10 | 550 | 55.00 | | 55.00 |
| 06/29/2021 | E. Catherine | Complaint | Drafting dispute letters to CRAs. | 0.30 | 350 | 105.00 | | 105.00 |
| 08/26/2021 | E. Catherine | Complaint | Drafting timeline | 0.20 | 350 | 70.00 | | 70.00 |
| 08/30/2021 | A. Keshavarz | Complaint | Review file for claims. Call with co-counsel outlining strategy for complaint. Contacted attorney experts in field for their take on approach. | 1.30 | 550 | 715.00 | | 715.00 |
| 08/31/2021 | E. Catherine | Complaint | Drafting complaint against dealership for impermissible pull. Researching procedure for suing licensed dealership. Looking for past lawsuits against the LLC | 2.60 | 350 | 910.00 | | 910.00 |
| 09/01/2021 | E. Catherine | Complaint | Drafting the complaint - section on Ms. Francois learning of the fraud and attempting to rectify it. Drafting questions to ask client during next call. | 0.30 | 350 | 105.00 | | 105.00 |
| 09/02/2021 | A. Keshavarz | Other | Call with client. | 0.20 | 550 | 110.00 | | 110.00 |
| 09/02/2021 | E. Catherine | Complaint | Drafting email/fax to DMV Field Investigation to explain fraud against client and ask for her license to be unsuspended. Fill out form and send to client. | 0.70 | 350 | 245.00 | | 245.00 |
| 09/08/2021 | E. Catherine | Complaint | Draft dispute letter for client to send to debt collector and insurance company. | 0.60 | 350 | 210.00 | | 210.00 |
| 11/22/2021 | E. Catherine | Other | Call with client about collections call | 0.10 | 350 | 35.00 | | 35.00 |
| 11/22/2021 | E. Catherine | Complaint | Draft dispute letter to MTA Bridge and Tunnels | 0.20 | 350 | 70.00 | | 70.00 |
| 11/22/2021 | E. Catherine | Complaint | Draft dispute letter to Transworld re MTA | 1.30 | 350 | 455.00 | | 455.00 |
| 02/25/2022 | E. Catherine | Complaint | Drafting letter to DMV Field Investigation | 0.30 | 350 | 105.00 | | 105.00 |
| 05/12/2022 | E. Catherine | Other | Call with client - pulling credit reports, preparing and sending disputes to credit bureaus | 1.10 | 350 | 385.00 | | 385.00 |
| 05/24/2022 | E. Catherine | Complaint | Checking on certified mail receipts for disputes to credit bureaus and adding information to compla | 0.60 | 350 | 210.00 | | 210.00 |
| 05/25/2022 | E. Catherine | Complaint | Drafting complaint - learning about id theft, initial dispute, receiving collection notices | 1.00 | 350 | 350.00 | | 350.00 |
| 05/25/2022 | Para by Atty | Complaint | Redacting exhibits to complaint | 1.00 | 100 | 100.00 | | 100.00 |
| 05/26/2022 | E. Catherine | Complaint | Redacting and organizing exhibits, drafting complaint section on tickets and progressive attempts t | 1.20 | 350 | 420.00 | | 420.00 |
| 05/26/2022 | E. Catherine | Complaint | Drafting complaint - sections on emotional distress and claims. | 0.60 | 350 | 210.00 | | 210.00 |
| 05/27/2022 | A. Keshavarz | Complaint | Research of pattern and practice of systematic fraud by Auto, including Attorney General action and action and stipulation of settlement. | 1.90 | 550 | 1,045.00 | | 1,045.00 |
| 05/30/2022 | A. Keshavarz | Complaint | Review and revised complaint. Signed off on complaint for filing. | 5.90 | 550 | 3,245.00 | | 3,245.00 |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------|
| 05/30/2022 | E. Catherine | Complaint | Drafting complaint, finalizing, filing | 4.50 | 350 | 1,575.00 | 1,575.00 |
| | | | Noted assignment of district and magistrate judge. Reviewed individual practice rules of district judge. Reviewed individual practice rules of district judge. Cross referenced with local rules to confirm discovery matters were before the district judge despite the assignment of a magistrate judge. | 0.30 | 550 | 165.00 | 165.00 |
| 05/31/2022 | A. Keshavarz | Discovery | Download, merge, OCR and backup complaint, email copy to client | 0.50 | 350 | 175.00 | 175.00 |
| 05/31/2022 | E. Catherine | Complaint | Drafting and filing summons | 0.30 | 350 | 105.00 | 105.00 |
| 06/02/2022 | E. Catherine | Discovery | Organizing documents for printing and service on defendants and on court | 0.30 | 350 | 105.00 | 105.00 |
| 06/21/2022 | E. Catherine | Complaint | Drafting cover letter for service of initial conferenc order and rules | 0.30 | 350 | 105.00 | 105.00 |
| 06/27/2022 | E. Catherine | Complaint | Returned call from Chris at Victory Auto Group, requesting copy of complaint emailed to him. | 0.10 | 350 | 35.00 | 35.00 |
| 07/11/2022 | E. Catherine | Complaint | Drafting new disputes to Equifax and TransUnion | 0.30 | 350 | 105.00 | 105.00 |
| 07/12/2022 | E. Catherine | Discovery | Drafting demand for preservation of documents | 0.60 | 350 | 210.00 | 210.00 |
| 07/19/2022 | A. Keshavarz | Discovery | Prepared for initial conference. Went through complaint, their prior correspondence, proposed stipulation on protecting records. Call with opposing counsel. Initial conference. | 1.70 | 550 | 935.00 | 935.00 |
| 07/19/2022 | E. Catherine | AC | Preparing for intial conference - re-reading complaint, looking for individual liability facts in | 0.50 | 350 | 175.00 | 175.00 |
| 07/19/2022 | E. Catherine | Depositions | Draft notice of depositions | 0.60 | 350 | 210.00 | 210.00 |
| 07/19/2022 | E. Catherine | Discovery | Drafting anti-spoilation stipulation | 0.30 | 350 | 105.00 | 105.00 |
| 07/19/2022 | E. Catherine | Discovery | Drafting first set of discovery requests | 0.80 | 350 | 280.00 | 280.00 |
| 07/19/2022 | E. Catherine | Discovery | Drafting subpoena to dealertrack. Research into the landscape of auto dealer management software in | 1.00 | 350 | 350.00 | 350.00 |
| 07/19/2022 | E. Catherine | MTD | Calendaring case management plan and deadlines for MTDs, oral argument, pretrial conference. | 0.10 | 350 | 35.00 | 35.00 |
| 07/20/2022 | A. Keshavarz | Depositions | Review and revised initial discovery demands, third party subpoenas, and notices of deposition. | 2.20 | 550 | 1,210.00 | 1,210.00 |
| 07/22/2022 | E. Catherine | Discovery | Reviewing edits to first set of discovery requests | 0.40 | 350 | 140.00 | 140.00 |
| 07/22/2022 | E. Catherine | Discovery | Finalizing and circulating Plaintiff's first set of discovery requests | 0.20 | 350 | 70.00 | 70.00 |
| 07/22/2022 | E. Catherine | Discovery | Amending subpoena to capital one based on additional discovery requests added by Ahmad. Finalizing | 0.70 | 350 | 245.00 | 245.00 |
| 07/25/2022 | A. Keshavarz | Discovery | Foil requests, PPP loan searches, and other searches to find information to further support joint and several liability. | 0.90 | 550 | 495.00 | 495.00 |
| 08/02/2022 | A. Keshavarz | Depositions | Review and revised notice of deposition. | 0.40 | 550 | 220.00 | 220.00 |
| 08/02/2022 | A. Keshavarz | Discovery | Review and revised our initial disclosure answers. | 0.50 | 550 | 275.00 | 275.00 |
| 08/02/2022 | E. Catherine | Discovery | Drafting initial disclosures | 0.70 | 350 | 245.00 | 245.00 |
| 08/03/2022 | A. Keshavarz | Discovery | Reviewed answer of defendants. Compared admissions to allegations to corresponding paragraphs. Reviewed their initial disclosure answers, noted witnesses to depose. | 0.50 | 550 | 275.00 | 275.00 |

| | | | | | | | |
|------------|--------------|-------------|---|-------|-----|----------|----------|
| 08/03/2022 | E. Catherine | Settlement | Called client to discuss settlement, she was in the middle of an appointment and asked to call back later | 0.10 | 350 | 35.00 | 35.00 |
| 08/03/2022 | E. Catherine | Settlement | Calling back Ms. Francois to discuss settlement. Left VM | 0.10 | 350 | 35.00 | 35.00 |
| 08/03/2022 | E. Catherine | Settlement | Speaking to Ms. Francois about settlement. | 0.10 | 350 | 35.00 | 35.00 |
| 08/04/2022 | E. Catherine | Depositions | Drafting second notice of depositions | 0.20 | 350 | 70.00 | 70.00 |
| 08/04/2022 | E. Catherine | Discovery | Draft letter on insurance disclosure | 0.10 | 350 | 35.00 | 35.00 |
| 08/15/2022 | E. Catherine | Depositions | Preparing oral application to Judge for insurance and identity of John Does and deposition dates. L | 0.20 | 350 | 70.00 | 70.00 |
| 08/16/2022 | A. Keshavarz | Discovery | Preparation fro call with opposing counsel regarding discovery dispute. Call with opposing counsel regarding discovery dispute. Call with opposing counsel and then with court. | 2.20 | 550 | 1,210.00 | 1,210.00 |
| 08/16/2022 | E. Catherine | Depositions | Call with opposing counsel on insurance, depositions, identification of persons with knowledge, oth | 0.10 | 350 | 35.00 | 35.00 |
| 08/16/2022 | E. Catherine | Discovery | Research on whether Defendants can redact insurance carrier name from production of insurance policy | 0.10 | 350 | 35.00 | 35.00 |
| 08/18/2022 | E. Catherine | Discovery | Making FOIL requests for records from NYAG and DCA | 0.40 | 350 | 140.00 | 140.00 |
| 08/18/2022 | E. Catherine | Discovery | Speaking with ADA Joli about criminal case. | 0.10 | 350 | 35.00 | 35.00 |
| 08/22/2022 | A. Keshavarz | Depositions | Reviewed correspondence from opposing counsel for deposition dates and there refusal to produce cou | 0.20 | 550 | 110.00 | 110.00 |
| 08/22/2022 | A. Keshavarz | MTD | Reviewed motion to dismiss sections as to preemption of state law claims, and preliminary research regarding the same. | 3.30 | 550 | 1,815.00 | 1,815.00 |
| 08/22/2022 | E. Catherine | Discovery | Calling Chase subpoena compliance department to ask about status of responding to Chase Auto subpoe | 0.20 | 350 | 70.00 | 70.00 |
| 08/23/2022 | E. Catherine | Discovery | Redrafting subpoenas to go to proper entities, drafting new subpoenas for adverse action letters an | 1.10 | 350 | 385.00 | 385.00 |
| 08/24/2022 | A. Keshavarz | Discovery | Reviewed their discovery answers and document production. Analyzed and outlined deficiencies, cross | 3.50 | 550 | 1,925.00 | 1,925.00 |
| 08/24/2022 | E. Catherine | Discovery | Typing up deficiencies for discovery responses | 0.30 | 350 | 105.00 | 105.00 |
| 08/24/2022 | E. Catherine | Discovery | Reviewing documents produced by Defendants | 0.20 | 350 | 70.00 | 70.00 |
| 08/24/2022 | E. Catherine | Discovery | Drafting email to opposing counsel regarding discovery | 0.20 | 350 | 70.00 | 70.00 |
| 08/24/2022 | E. Catherine | Discovery | Printing and serving subpoenas on Capital One and Chase | 0.50 | 350 | 175.00 | 175.00 |
| 08/24/2022 | E. Catherine | Discovery | Revising and sending out subpoenas against CRAs | 0.30 | 350 | 105.00 | 105.00 |
| 08/25/2022 | A. Keshavarz | MTD | Research responding to their arguments in MTD. Research on FCRA preemption of stat law claims, reas | 10.50 | 550 | 5,775.00 | 5,775.00 |
| 08/25/2022 | E. Catherine | Discovery | Addressing issues raised in email response to our email about discovery deficiencies. | 0.20 | 350 | 70.00 | 70.00 |
| 08/25/2022 | E. Catherine | MTD | Research on case law cited in the Defendants MTD and distinguishing authority | 1.70 | 350 | 595.00 | 595.00 |
| 08/25/2022 | E. Catherine | MTD | Reading Defendants' MTD | 0.30 | 350 | 105.00 | 105.00 |
| 08/25/2022 | E. Catherine | MTD | Reviewing case law cited by Defendants | 1.00 | 350 | 350.00 | 350.00 |

| | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|----------|
| 08/26/2022 | A. Keshavarz | AC | Worked on issues related to amended complaint, adding additional facts, | 6.20 | 550 | 3,410.00 | 3,410.00 |
| 08/26/2022 | A. Keshavarz | Discovery | Telephone hearing with law clerk on our application to compel. | 1.00 | 550 | 550.00 | 550.00 |
| 08/26/2022 | E. Catherine | Discovery | Preparing for oral arguments on discovery application | 0.50 | 350 | 175.00 | 175.00 |
| 08/26/2022 | E. Catherine | Discovery | Oral arguments on discovery application | 1.10 | 350 | 385.00 | 385.00 |
| 08/26/2022 | E. Catherine | MSJ | Reviewing MMNA agreement from Nelson case and Nelson 56.1 statement | 0.50 | 350 | 175.00 | 175.00 |
| 08/26/2022 | E. Catherine | MTD | Continuing legal research on MTD issues | 0.70 | 350 | 245.00 | 245.00 |
| 08/26/2022 | E. Catherine | MTD | Outlining opposition to MTD | 0.30 | 350 | 105.00 | 105.00 |
| 08/26/2022 | E. Catherine | MTD | Research on negligence issues in MTD to determine how to strengthen those claims in our FAC | 1.20 | 350 | 420.00 | 420.00 |
| 08/26/2022 | E. Catherine | MTD | Drafting negligence argument in opposition to MTD | 2.30 | 350 | 805.00 | 805.00 |
| 08/26/2022 | E. Catherine | Discovery | Calling Interstate National Dealer Services to confirm existence of contract. They confirm contract | 0.20 | 350 | 70.00 | 70.00 |
| 08/29/2022 | A. Keshavarz | AC | Review and revised complaint to add additional factual allegations, clarify the scope of our neglig | 4.40 | 550 | 2,420.00 | 2,420.00 |
| 08/29/2022 | A. Keshavarz | Other | Call with client. | 0.80 | 550 | 440.00 | 440.00 |
| 08/29/2022 | A. Keshavarz | Depositions | Went through court filings and affidavits from NY AG suit and filings and deposition transcript fro | 5.60 | 550 | 3,080.00 | 3,080.00 |
| 08/29/2022 | E. Catherine | AC | Amending first amended complaint - adding adverse action notices, adding Utnicki, adding uncle and | 2.00 | 350 | 700.00 | 700.00 |
| 08/29/2022 | E. Catherine | Other | Calling Ms. Francois to go over factual issues for amended complaint | 0.80 | 350 | 280.00 | 280.00 |
| 08/29/2022 | E. Catherine | AC | Reviewing Ahmad's edits and comments on FAC, looking at other lawsuits | 1.40 | 350 | 490.00 | 490.00 |
| 08/29/2022 | E. Catherine | AC | Finalizing and filing FAC | 0.40 | 350 | 140.00 | 140.00 |
| 08/29/2022 | E. Catherine | MTD | Drafting arguments for negligence in opposition to MTD | 3.30 | 350 | 1,155.00 | 1,155.00 |
| 08/29/2022 | E. Catherine | MTD | Researching adding section to opp to mtd asking for leave to amend | 0.40 | 350 | 140.00 | 140.00 |
| 08/29/2022 | E. Catherine | MTD | Amending the rule 26 disclosures | 0.20 | 350 | 70.00 | 70.00 |
| 08/30/2022 | A. Keshavarz | MTD | Review and revised opposition to motion for judgment on the pleadings. | 4.60 | 550 | 2,530.00 | 2,530.00 |
| 08/30/2022 | E. Catherine | AC | Reviewing previously drafted sections on negligence, inserting FAC citations, amending as appropria | 1.00 | 350 | 350.00 | 350.00 |
| 08/30/2022 | E. Catherine | MTD | Drafting introduction and fact section of opposition to MTD | 2.00 | 350 | 700.00 | 700.00 |
| 08/30/2022 | E. Catherine | MTD | Drafting declaration in opposition to mtd | 0.10 | 350 | 35.00 | 35.00 |
| 08/30/2022 | E. Catherine | MTD | Working on condensing MOL Opp to MTD to 25 pages. | 0.60 | 350 | 210.00 | 210.00 |
| 08/30/2022 | E. Catherine | MTD | Reviewing Ahmad edits and comments to opp ot mtd | 0.70 | 350 | 245.00 | 245.00 |
| 08/30/2022 | E. Catherine | MTD | Condensing again to get back to 25 p | 0.50 | 350 | 175.00 | 175.00 |
| 08/30/2022 | E. Catherine | MTD | Finalizing and filing opp to mtd | 0.50 | 350 | 175.00 | 175.00 |
| 08/30/2022 | E. Catherine | Discovery | Amending Rule 26 disclosures | 0.20 | 350 | 70.00 | 70.00 |

| | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|----------|
| 08/30/2022 | Para by Atty | AC | Downloading, merging, and ocring FAC | 0.40 | 100 | 40.00 | 40.00 |
| 08/31/2022 | Para by Atty | MTD | Downloading, merging, and OCRing Opp to MTD briefing. Drafting cover letter for courtesy copy, send | 0.80 | 100 | 80.00 | 80.00 |
| 09/01/2022 | E. Catherine | Discovery | Drafting subpoenas and sending them out for service | 0.70 | 350 | 245.00 | 245.00 |
| 09/02/2022 | E. Catherine | Depositions | Revising notice of deposition | 0.60 | 350 | 210.00 | 210.00 |
| 09/02/2022 | E. Catherine | Depositions | Drafting subpoena to depose Emmanuel LaForest | 0.30 | 350 | 105.00 | 105.00 |
| 09/02/2022 | E. Catherine | Discovery | Amend the subpoena to Mitsubishi per Ahmad's specifications, finalizing, sending out for service. | 0.30 | 350 | 105.00 | 105.00 |
| 09/06/2022 | A. Keshavarz | Discovery | Review and revised correspondence with opposing counsel regarding their request for court intervention (they won't propose specifics of the changes they say they want to the scheduling order). Review prior discovery correspondence and amended complaint. | 1.40 | 550 | 770.00 | 770.00 |
| 09/06/2022 | Para by Atty | AC | Drafting waivers of service for new defendants | 0.10 | 100 | 10.00 | 10.00 |
| 09/07/2022 | E. Catherine | Discovery | Reviewing Truist objections and responses to the subpoena, emailing their counsel for follow up | 0.20 | 350 | 70.00 | 70.00 |
| 09/07/2022 | E. Catherine | Discovery | Discussing subpoena response from Truist with their counsel. | 0.20 | 350 | 70.00 | 70.00 |
| 09/09/2022 | E. Catherine | AC | Drafting and filing summons for new defendants | 0.20 | 350 | 70.00 | 70.00 |
| 09/09/2022 | E. Catherine | Depositions | Spoke with Emmanuel Laforest on the phone. He said the deposition date was fine for him. He started | 0.10 | 350 | 35.00 | 35.00 |
| 09/09/2022 | E. Catherine | Discovery | Calling opposing counsel to determine status of items we emailed about on Tuesday - waiver of servi | 0.30 | 350 | 105.00 | 105.00 |
| 09/09/2022 | Para by Atty | Discovery | Requesting skiptrace on David Perez. | 0.10 | 100 | 10.00 | 10.00 |
| 09/09/2022 | E. Catherine | Discovery | Research on Fifth Amendment rights for Emmanuel Laforest | 0.70 | 350 | 245.00 | 245.00 |
| 09/12/2022 | A. Keshavarz | Discovery | Began drafting answers to their first set of discovery demands. Call with client. | 6.50 | 550 | 3,575.00 | 3,575.00 |
| 09/12/2022 | E. Catherine | Discovery | Reviewing discovery responses drafted by Ahmad. | 0.30 | 350 | 105.00 | 105.00 |
| 09/13/2022 | A. Keshavarz | Discovery | Claim evaluation update based on prior correspondence with opposing counsel, document production of both sides to date, their theory of the case. | 2.20 | 550 | 1,210.00 | 1,210.00 |
| 09/13/2022 | E. Catherine | Discovery | Finalize document production | 1.50 | 350 | 525.00 | 525.00 |
| 09/13/2022 | E. Catherine | Discovery | Calling person who I subpoenaed at the Capital One branch. Contacting subpoena team via email and fax. | 0.10 | 350 | 35.00 | 35.00 |
| 09/14/2022 | A. Keshavarz | Discovery | Review and revised correspondence with counsel for Mitsubishi Motors North America regarding our subpoena and there objections thereto. Called to him to try to work out an agreement. Discussed obligations under FRCP 45 and his concerns. | 0.70 | 550 | 385.00 | 385.00 |

| | | | | | | |
|------------|--------------|--|---|------|--------|----------|
| | | Reviewed their supplemental document production, audio and video files. Noted that the account notes had a stamp that they were printed on August 24, even though opposing counsel told to court attorney they were still waiting for electronic documents from client and the person in charge was out. | 0.60 | 550 | 330.00 | 330.00 |
| 09/14/2022 | A. Keshavarz | Discovery | | | | |
| 09/14/2022 | E. Catherine | Discovery | Responding to email from Mitsubishi regarding subpoena to them | 0.40 | 350 | 140.00 |
| | | | | | | |
| 09/14/2022 | E. Catherine | Discovery | Listening to recordings produced by defendants in supplemental production, watch video, review supplemental documents. | 0.70 | 350 | 245.00 |
| | | | | | | |
| 09/15/2022 | A. Keshavarz | Depositions | Call with counsel as to how to proceed with discovery and depositions given their non-responsive answers. | 1.40 | 550 | 770.00 |
| | | | | | | |
| 09/15/2022 | A. Keshavarz | Discovery | Preliminary call with counsel for Mitsubishi to get through the specific items in the subpoena. | 0.40 | 550 | 220.00 |
| | | | | | | |
| 09/15/2022 | E. Catherine | Discovery | Downloading, merging, and OCRing documents from TransUnion | 0.20 | 350 | 70.00 |
| | | | | | | |
| 09/16/2022 | A. Keshavarz | Discovery | Additional call with counsel for Mitsubishi about items sought in subpoena, and preparation for the same. We went item by item with him | 0.90 | 550 | 495.00 |
| | | | | | | |
| 09/16/2022 | A. Keshavarz | Discovery | Review and revised lengthy correspondence with opposing counsel regarding their failure to provide | 1.60 | 550 | 880.00 |
| | | | | | | |
| 09/16/2022 | E. Catherine | Discovery | Drafting application to Court to hold discovery conference | 0.60 | 350 | 210.00 |
| | | | | | | |
| 09/16/2022 | E. Catherine | Discovery | Drafting email response to opposing counsel's frivolous email claiming raising our discovery disput | 0.20 | 350 | 70.00 |
| | | | | | | |
| 09/19/2022 | A. Keshavarz | Discovery | Call with chambers regarding compelling production, and preparation for the same. | 1.70 | 550 | 935.00 |
| | | | | | | |
| 09/19/2022 | E. Catherine | Discovery | Preparing for discovery hearing | 0.10 | 350 | 35.00 |
| | | | | | | |
| 09/22/2022 | E. Catherine | Discovery | Reviewing supplemental documents produced on September 21 | 0.10 | 350 | 35.00 |
| | | | | | | |
| 09/22/2022 | E. Catherine | Discovery | Sending out subpoenas to Equifax, PenFed, Mercedes-Benz | 0.60 | 350 | 210.00 |
| | | | | | | |
| 09/23/2022 | E. Catherine | Discovery | Reviewing document response by Mitsubishi in response to subpoena | 0.10 | 350 | 35.00 |
| | | | | | | |
| 09/27/2022 | E. Catherine | Discovery | Following up with NY AG office about complying with FOIL request. | 0.30 | 350 | 105.00 |
| | | | | | | |
| 09/28/2022 | E. Catherine | Discovery | Conferring with Stephen about subpoena | 0.30 | 350 | 105.00 |
| | | | | | | |
| 09/30/2022 | E. Catherine | Discovery | Drafting protective order based on model protective order | 0.30 | 350 | 105.00 |
| | | | | | | |
| 10/03/2022 | E. Catherine | Depositions | Deposition outline for Emmanuel Laforest | 0.80 | 350 | 280.00 |
| | | | | | | |
| 10/04/2022 | A. Keshavarz | Depositions | Review and revised correspondence with opposing counsel regarding missing documents, deposition dates. Call with opposing counsel regarding the same. | 0.70 | 550 | 385.00 |
| | | | | | | |
| 10/04/2022 | E. Catherine | Depositions | Deposition outline for Emmanuel Laforest | 2.30 | 350 | 805.00 |
| | | | | | | |
| 10/04/2022 | E. Catherine | Discovery | Calling opposing counsel to make application to the court about protective order | 0.40 | 350 | 140.00 |
| | | | | | | |
| 10/05/2022 | A. Keshavarz | Depositions | Review and revised deposition outline of law partner. Went to deposition for Emmanuel LaForest. Waited for him to appear, No show. | 2.30 | 550 | 1,265.00 |
| | | | | | | |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------|
| 10/05/2022 | E. Catherine | Depositions | Drafting outline for deposition of Emmanuel Laforest | 3.70 | 350 | 1,295.00 | 1,295.00 |
| 10/05/2022 | Para by Atty | Depositions | Merging together exhibits for Laforest deposition for printing and updating dropbox | 0.40 | 100 | 40.00 | 40.00 |
| 10/06/2022 | A. Keshavarz | Discovery | Review and revised correspondence with opposing counsels regarding moving to enforce subpoena again | 0.30 | 550 | 165.00 | 165.00 |
| 10/06/2022 | E. Catherine | Depositions | Draft notice of deposition for new dates | 0.30 | 350 | 105.00 | 105.00 |
| 10/06/2022 | E. Catherine | Discovery | Call with Capital One on subpoena response | 0.10 | 350 | 35.00 | 35.00 |
| 10/06/2022 | E. Catherine | Discovery | Phone Mr. Laforest at (917) 688-7340, left VM informing him of hearing tomorrow at 2 pm to move for | 0.10 | 350 | 35.00 | 35.00 |
| 10/07/2022 | A. Keshavarz | Discovery | Hearing to court and preparation for the same. | 0.60 | 550 | 330.00 | 330.00 |
| 10/11/2022 | A. Keshavarz | Depositions | Reviewed order of court on our applications for contempt against non-party witness and for depositi | 0.10 | 550 | 55.00 | 55.00 |
| 10/11/2022 | E. Catherine | Discovery | Downloading documents from Capital One, ocring, reviewing | 0.30 | 350 | 105.00 | 105.00 |
| 10/11/2022 | E. Catherine | Discovery | Drafting proposed contempt order for Emmanuel Laforest | 1.10 | 350 | 385.00 | 385.00 |
| 10/11/2022 | E. Catherine | MTD | Reading 2nd MTD - outlining opposition to 2nd MTD, drafting section on motion to strike | 1.00 | 350 | 350.00 | 350.00 |
| 10/11/2022 | E. Catherine | MTD | Research for 2nd MTD on Prout and G-I Holdings Inc. | 0.40 | 350 | 140.00 | 140.00 |
| 10/11/2022 | E. Catherine | Discovery | Attempt to call Mr. Laforest at phone number on cashed-check. Revising subpoena with new date and time and emailing to witness at new email. | 0.90 | 350 | 315.00 | 315.00 |
| 10/12/2022 | A. Keshavarz | Depositions | Reviewed e-mail from opposing counsel last night objecting to deposition of third party. Research on deposing third non-party. Worked on trying to get witness to appear. | 2.90 | 550 | 1,595.00 | 1,595.00 |
| 10/12/2022 | A. Keshavarz | Discovery | Call with potential expert, and preparation for the same. | 1.10 | 550 | 605.00 | 605.00 |
| 10/12/2022 | E. Catherine | Discovery | Research into what is required for expert disclosures | 0.40 | 350 | 140.00 | 140.00 |
| 10/13/2022 | A. Keshavarz | MTD | Review and revised correspondence to opposing counsel seeking one day extension to filing opposition to motion to dismiss given they late filed their MTD. | 0.10 | 550 | 55.00 | 55.00 |
| 10/13/2022 | E. Catherine | Discovery | Reviewing Capital One response to subpoena | 0.10 | 350 | 35.00 | 35.00 |
| 10/13/2022 | E. Catherine | Discovery | Follow up on third party discovery - email to truist, email to penfed, calling jpmorgan chase | 0.30 | 350 | 105.00 | 105.00 |
| 10/13/2022 | E. Catherine | MTD | Drafting opposition to MTD - section on Northrop not being good case law, section on "partial" pre-emption, section on duplication, section on damages, section on motion to strike, intro | 3.70 | 350 | 1,295.00 | 1,295.00 |
| 10/17/2022 | A. Keshavarz | MTD | Review and revised opposition to motion to dismiss. | 4.10 | 550 | 2,255.00 | 2,255.00 |
| 10/17/2022 | E. Catherine | MTD | Reviewing Ahmad's comments and edits to MOL to Opp to 2nd mtd, cutting down to 25 pages | 0.50 | 350 | 175.00 | 175.00 |
| 10/17/2022 | E. Catherine | MTD | Finalizing the opposition to 2nd MTD and filing | 0.50 | 350 | 175.00 | 175.00 |
| 10/17/2022 | Para by Atty | MTD | Downloading, merging, and OCRing filestamped copy of opp to 2nd mtd, drafting cover letter for court. | 0.50 | 100 | 50.00 | 50.00 |

| | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|----------|
| 10/18/2022 | A. Keshavarz | Discovery | Reviewed objections to subpoena by Capital One. Call with Capital One legal department. and preparation for the same. | 1.30 | 550 | 715.00 | 715.00 |
| 10/18/2022 | E. Catherine | Discovery | Drafting supplemental subpoena to Capital One | 0.20 | 350 | 70.00 | 70.00 |
| 10/19/2022 | A. Keshavarz | Discovery | Reviewed documents produced by Capital One in response to our subpoena. Review and revised correspondence. | 0.60 | 550 | 330.00 | 330.00 |
| 10/19/2022 | A. Keshavarz | Discovery | Correspondence with counsel for Capital One. Review of documents. Noted deficiencies. Call with counsel for Capital One to discuss the same. | 1.10 | 550 | 605.00 | 605.00 |
| 10/19/2022 | Para by Atty | Discovery | Downloading and OCRing the capital one docs, revising supplemental subpoena and sending to Capital | 1.70 | 100 | 170.00 | 170.00 |
| 10/20/2022 | E. Catherine | Discovery | Revising stipulation with truit on amended subpoena | 0.10 | 350 | 35.00 | 35.00 |
| 10/21/2022 | Para by Atty | Discovery | Downloading, ocring, and reviewing documents produced by Capital One | 0.50 | 100 | 50.00 | 50.00 |
| 10/24/2022 | A. Keshavarz | Discovery | Outlining discovery needed for MSJ and trial that we do not have, that we need to compel, or that we need to propound. | 1.10 | 550 | 605.00 | 605.00 |
| 10/24/2022 | E. Catherine | Discovery | Calling transunion to get a business record affidavit for the subpoena response. Left VM, sent emai | 0.10 | 350 | 35.00 | 35.00 |
| 10/25/2022 | A. Keshavarz | Depositions | Deposition of Emanuel LaForest. Review and revised deposition outline. | 4.00 | 550 | 2,200.00 | 2,200.00 |
| 10/25/2022 | E. Catherine | Depositions | Preparing for deposition - printing exhibits, reviewing outline. Conducting deposition of Emmanuel | 4.70 | 350 | 1,645.00 | 1,645.00 |
| 10/25/2022 | E. Catherine | Discovery | Calling back Equifax about subpoena. Left VM | 0.10 | 350 | 35.00 | 35.00 |
| 10/25/2022 | Para by Atty | MTD | Downloading Reply insupport of 2nd MTD | 0.10 | 100 | 10.00 | 10.00 |
| 10/26/2022 | E. Catherine | Depositions | Drafting revised deposition notice with dates given by Patrick during Laforest deposition | 0.50 | 350 | 175.00 | 175.00 |
| 10/27/2022 | E. Catherine | Depositions | Amending disclosures with information provided by client and by Emmanuel Laforest during his deposition. Amending interrogatory responses with same. | 0.60 | 350 | 210.00 | 210.00 |
| 10/27/2022 | E. Catherine | Discovery | Drafting DealerTrack subpoena. Amending to add Jami Singer and info for her and Emmanuel Laforest, | 1.10 | 350 | 385.00 | 385.00 |
| 10/28/2022 | E. Catherine | Depositions | Scheduling depositions with court reporters | 0.20 | 350 | 70.00 | 70.00 |
| 10/28/2022 | E. Catherine | Depositions | Outline for deposition of David Perez | 0.40 | 350 | 140.00 | 140.00 |
| 10/28/2022 | E. Catherine | Discovery | Re-noticing and resending truit subpoena to correct entity | 0.10 | 350 | 35.00 | 35.00 |
| 10/31/2022 | A. Keshavarz | Depositions | Preparation for call with court regarding tomorrow's deposition. Reviewed prior correspondence with opposing counsel regarding the same. Follow up correspondence with opposing counsel. Review and revised correspondence to them. | 1.10 | 550 | 605.00 | 605.00 |
| 11/01/2022 | A. Keshavarz | Depositions | Call with opposing counsel regarding depositions. | 0.20 | 550 | 110.00 | 110.00 |
| 11/01/2022 | E. Catherine | MTD | Preparing for oral arguments on the Second MTD - reading and highlighting Defendants' briefing. | 0.30 | 350 | 105.00 | 105.00 |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------|
| 11/01/2022 | E. Catherine | MTD | Preparing for oral arguments on 2nd MTD - re-reading our motion and highlighting, outlining argument | 1.20 | 350 | 420.00 | 420.00 |
| 11/01/2022 | E. Catherine | MTD | Preparing for oral arguments on 2nd MTD - outlining section on negligence, on motion to strike | 1.30 | 350 | 455.00 | 455.00 |
| 11/01/2022 | E. Catherine | MTD | Electronic device application for November 2 hearing | 0.10 | 350 | 35.00 | 35.00 |
| 11/01/2022 | E. Catherine | MTD | Joint application for electronic devices at November 2 hearing | 0.10 | 350 | 35.00 | 35.00 |
| 11/02/2022 | A. Keshavarz | Depositions | Call with opposing counsels regarding depositions and preparation for the same. | 0.80 | 550 | 440.00 | 440.00 |
| 11/02/2022 | A. Keshavarz | MTD | Prepared for hearing on motion to dismiss and hearing. | 6.10 | 550 | 3,355.00 | 3,355.00 |
| 11/02/2022 | E. Catherine | Discovery | Reviewing Capital One documents, determining what to follow up on | 0.70 | 350 | 245.00 | 245.00 |
| 11/02/2022 | E. Catherine | MTD | Practicing oral arguments for opposition to 2nd MTD | 0.40 | 350 | 140.00 | 140.00 |
| 11/02/2022 | E. Catherine | MTD | Preparing for oral arguments on the 2nd MTD. Oral arguments on the 2nd MTD. | 3.00 | 350 | 1,050.00 | 1,050.00 |
| 11/04/2022 | A. Keshavarz | Discovery | Document review. | 0.50 | 550 | 275.00 | 275.00 |
| 11/04/2022 | E. Catherine | Discovery | Emailing Capital One a list of issues in regards to their subpoena response | 0.10 | 350 | 35.00 | 35.00 |
| 11/04/2022 | E. Catherine | Discovery | Drafting subpoena to New York DMV | 0.20 | 350 | 70.00 | 70.00 |
| 11/07/2022 | E. Catherine | Discovery | Drafting subpoena to NY DMV | 0.10 | 350 | 35.00 | 35.00 |
| 11/07/2022 | E. Catherine | Discovery | FOIL requests to NY DMV and DCA and DFS | 0.40 | 350 | 140.00 | 140.00 |
| 11/07/2022 | E. Catherine | Discovery | Finalizing and sending out subpoena to the DMV | 0.20 | 350 | 70.00 | 70.00 |
| 11/15/2022 | A. Keshavarz | Depositions | Review and revised application to court for depositions. Correspondence regarding the same. Telephone hearing with the court regarding depositions and preparation for the same. | 1.90 | 550 | 1,045.00 | 1,045.00 |
| 11/15/2022 | E. Catherine | Depositions | Drafting motion to compel depositions | 1.70 | 350 | 595.00 | -595.00 |
| 11/15/2022 | E. Catherine | Depositions | Drafting outline for the deposition of David Perez | 0.50 | 350 | 175.00 | 175.00 |
| 11/15/2022 | Para by Atty | Complaint | Paying for service of process on NY SOS | 0.10 | 100 | 10.00 | 10.00 |
| 11/16/2022 | A. Keshavarz | Discovery | Research on capital one deficiencies. | 0.80 | 550 | 440.00 | 440.00 |
| 11/16/2022 | E. Catherine | Depositions | Scheduling depositions with Esquire | 0.50 | 350 | 175.00 | 175.00 |
| 11/16/2022 | E. Catherine | Depositions | Drafting deposition outline for david perez | 0.50 | 350 | 175.00 | 175.00 |
| 11/17/2022 | A. Keshavarz | Depositions | Reviewed and revised correspondence with opposing counsel regarding depositions, discovery. | 0.90 | 550 | 495.00 | 495.00 |
| 11/17/2022 | A. Keshavarz | Discovery | Drafted second set of discovery demands. | 0.60 | 550 | 330.00 | 330.00 |
| 11/17/2022 | E. Catherine | Depositions | Drafting deposition outline for David Perez | 3.40 | 350 | 1,190.00 | 1,190.00 |
| 11/17/2022 | E. Catherine | Depositions | Reviewing CBC agreement and responding to email from opposing counsel about deposition scheduling | 0.30 | 350 | 105.00 | 105.00 |
| 11/18/2022 | A. Keshavarz | Depositions | Prepared for deposition of Defendant David Perez. Reviewed document production. | 2.90 | 550 | 1,595.00 | 1,595.00 |
| 11/18/2022 | E. Catherine | Depositions | Organizing documents for David Perez deposition | 0.50 | 350 | 175.00 | 175.00 |
| 11/18/2022 | E. Catherine | Depositions | Drafting David Perez deposition outline - going through documents | 2.20 | 350 | 770.00 | 770.00 |
| 11/18/2022 | E. Catherine | Discovery | Producing subpoena responses to defendants | 2.60 | 350 | 910.00 | 910.00 |

| | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|-----------|
| 11/20/2022 | A. Keshavarz | Depositions | Review and revised Perez deposition outline. Document analysis for deposition outline. | 7.90 | 550 | 4,345.00 | 4,345.00 |
| 11/21/2022 | A. Keshavarz | Depositions | Deposition of David Perez and preparation for the same. | 8.30 | 550 | 4,565.00 | 4,565.00 |
| 11/21/2022 | E. Catherine | Depositions | Finalizing preparation for David Perez deposition | 0.50 | 350 | 175.00 | 175.00 |
| 11/21/2022 | E. Catherine | Depositions | Taking notes at David Perez deposition | 6.00 | 350 | 2,100.00 | -2,100.00 |
| 11/22/2022 | A. Keshavarz | Depositions | Deposition of client and preparation for the same. Client meeting. Document review in preparation for deposition. | 7.70 | 550 | 4,235.00 | 4,235.00 |
| 11/22/2022 | A. Keshavarz | Depositions | Review and revised outline for deposition of STAVROS ORSARIS | 2.40 | 550 | 1,320.00 | 1,320.00 |
| 11/22/2022 | A. Keshavarz | Discovery | Research on witnesses, potential witnesses. Noted that Chris Osaris who was a top manager at Victory Auto through at least 2021, had previously been convicted of fraud while working as general manager at another dealership, Major Auto, and sentenced to 7 years. After serving his term, he started working as a manager at Victory Auto . | 0.80 | 550 | 440.00 | 440.00 |
| 11/22/2022 | E. Catherine | Depositions | Outlining deposition of Stavros Orsaris / Spartan Auto Group | 5.00 | 350 | 1,750.00 | 1,750.00 |
| 11/22/2022 | E. Catherine | Depositions | Reviewing Ahmad notes from defending Francois deposition | 0.20 | 350 | 70.00 | 70.00 |
| 11/22/2022 | Para by Atty | Discovery | Converting supplemental production to pdf, batestamping, sending to opposing counsel | 0.30 | 100 | 30.00 | 30.00 |
| 11/23/2022 | A. Keshavarz | Depositions | Early morning review and revised deposition outline for Starvos Osaris. Deposition of witness. | 9.90 | 550 | 5,445.00 | -5,445.00 |
| 11/23/2022 | E. Catherine | Depositions | Prepping for Stavros Orsaris / Spartan deposition. Taking deposition | 8.40 | 350 | 2,940.00 | 2,940.00 |
| 11/28/2022 | A. Keshavarz | Depositions | Review and revised deposition outline. Document review to integrate questions based on specific pages of production. | 1.80 | 550 | 990.00 | 990.00 |
| 11/28/2022 | E. Catherine | Depositions | Deposition outline for Philip Argyropoulos | 1.40 | 350 | 490.00 | 490.00 |
| 11/28/2022 | E. Catherine | Depositions | Rescheduling depositions based on opposing counsel confirmation of new dates and times proposed on November 24. | 0.10 | 350 | 35.00 | 35.00 |
| 11/28/2022 | E. Catherine | Depositions | Making edits to the Philip deposition outline based on Ahmad feedback. Conducting deposition of Philip Argyropoulos | 3.20 | 350 | 1,120.00 | 1,120.00 |
| 11/28/2022 | E. Catherine | Discovery | Drafting a subpoena to testify to Jami Singer. | 0.20 | 350 | 70.00 | 70.00 |
| 11/28/2022 | E. Catherine | Discovery | Drafting subpoena for documents to verizon | 0.20 | 350 | 70.00 | 70.00 |
| 11/29/2022 | A. Keshavarz | Discovery | Contacted witness Jami Singer. | 0.30 | 550 | 165.00 | 165.00 |
| 11/29/2022 | A. Keshavarz | Discovery | Issued a new subpoena and document demand based on conversation with witness. | 0.40 | 550 | 220.00 | 220.00 |
| 11/29/2022 | E. Catherine | Depositions | Drafting deposition outline for Yessica Vallejo. | 4.30 | 350 | 1,505.00 | 1,505.00 |
| 11/29/2022 | E. Catherine | Discovery | Finalizing subpoena and sending out for service | 0.20 | 350 | 70.00 | 70.00 |
| 11/30/2022 | A. Keshavarz | Depositions | Review and revised outline for deposition of finance manager Vallejo. | 1.90 | 550 | 1,045.00 | 1,045.00 |
| 11/30/2022 | A. Keshavarz | Depositions | Deposition of Yessica Vallejo. | 7.00 | 550 | 3,850.00 | -3,850.00 |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------------|
| 11/30/2022 | E. Catherine | Depositions | Discussing with Ahmad his feedback and comments on the Vallejo deposition outline | 0.20 | 350 | 70.00 | 70.00 |
| 11/30/2022 | E. Catherine | Depositions | Deposition of Yessica Vallejo | 7.00 | 350 | 2,450.00 | 2,450.00 |
| 11/30/2022 | E. Catherine | Depositions | Sending new exhibits to opposing counsel. finalizing Vallejo outline. | 1.30 | 350 | 455.00 | 455.00 |
| 12/01/2022 | A. Keshavarz | Discovery | Call with capital one and preparation for the same. | 1.30 | 550 | 715.00 | 715.00 |
| 12/01/2022 | E. Catherine | Depositions | Drafting deposition outline for Diane Argyropoulos | 3.70 | 350 | 1,295.00 | 1,295.00 |
| 12/01/2022 | E. Catherine | Discovery | Call with Capital One about subpoena for employee | 0.90 | 350 | 315.00 | 315.00 |
| 12/01/2022 | E. Catherine | Discovery | Determining what phone numbers we need in a declaration for the Stavros Orsaris cell phone records, | 0.40 | 350 | 140.00 | 140.00 |
| 12/02/2022 | E. Catherine | Depositions | Finalizing preparations for deposition of Diane Argyropoulos - sending second supplemental production to opposing counsel, finishing outline, circulating zoom information | 0.50 | 350 | 175.00 | 175.00 |
| 12/02/2022 | E. Catherine | Discovery | Drafting stipulation on Stavros Orsaris call records | 0.40 | 350 | 140.00 | 140.00 |
| 12/02/2022 | E. Catherine | Depositions | Figuring out how to use screen share on Zoom to accomodate request by opposing counsel, opposing counsel, finishing outline, circulating zoom information | 1.00 | 350 | 350.00 | -250.00 100.00 |
| 12/08/2022 | A. Keshavarz | Discovery | Reviewed new documents produced by Dealertrack showing an undisclosed employee at the dealership who pulled the credit report of client. | 0.90 | 550 | 495.00 | 495.00 |
| 12/08/2022 | Para by Atty | Depositions | Bate stamping and producing to Defendants supplemental production from dealertrack, drafting deposition notice for Y. Ventura and serving on Defendants. | 0.20 | 100 | 20.00 | 20.00 |
| 12/08/2022 | E. Catherine | Depositions | Re-reading outline for Diane Argyropoulos deposition in preparation for deposition tomorrow | 0.20 | 350 | 70.00 | 70.00 |
| 12/08/2022 | E. Catherine | Discovery | Amending and sending out for service subpoena to capital one to testify | 0.10 | 350 | 35.00 | 35.00 |
| 12/09/2022 | A. Keshavarz | Depositions | Review and revised deposition outline for Diane Argyropoulos. | 0.40 | 550 | 220.00 | 220.00 |
| 12/09/2022 | A. Keshavarz | Depositions | Deposition of Diane Argyropoulos. | 5.00 | 550 | 2,750.00 | -2,750.00 |
| 12/09/2022 | A. Keshavarz | Depositions | Post deposition follow up. | 1.50 | 550 | 825.00 | 825.00 |
| 12/09/2022 | E. Catherine | Depositions | Finalizing deposition outline for Diane Argyropoulos | 1.00 | 350 | 350.00 | 350.00 |
| 12/09/2022 | E. Catherine | Depositions | Conducting deposition of Diane Argyropoulos | 5.00 | 350 | 1,750.00 | 1,750.00 |
| 12/12/2022 | E. Catherine | Discovery | Revising subpoena to serve Ms. Ventura at her home residence. | 0.20 | 350 | 70.00 | 70.00 |
| 12/13/2022 | A. Keshavarz | Depositions | Review and revised deposition outline for Jami Singer. | 0.50 | 550 | 275.00 | 275.00 |
| 12/13/2022 | A. Keshavarz | Depositions | Deposition of Jami Singer. | 1.10 | 550 | 605.00 | -605.00 |
| 12/13/2022 | A. Keshavarz | Discovery | Based on disclosure yesterday afternoon of a prior address for the Yosmaily Ventura. Issued an additional subpoena for the same. | 0.40 | 550 | 220.00 | 220.00 |
| 12/13/2022 | E. Catherine | Depositions | Drafting outline for Jami Singer deposition | 0.60 | 350 | 210.00 | 210.00 |
| 12/13/2022 | E. Catherine | Depositions | Deposition of Jami Singer | 1.10 | 350 | 385.00 | 385.00 |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------|
| 12/14/2022 | A. Keshavarz | Discovery | Contact with process server throughout the day to check on status of service of Yosmaily Ventura, now-former employee of Victory who also pulled client's credit report. | 0.30 | 550 | 165.00 | 165.00 |
| 12/14/2022 | A. Keshavarz | Discovery | Reviewed, revised notes regarding Papito Momplaisir. | 0.30 | 550 | 165.00 | 165.00 |
| 12/14/2022 | E. Catherine | Discovery | Drafting second set of discovery requests Papito Momplaisir. | 0.30 | 350 | 105.00 | 105.00 |
| 12/15/2022 | E. Catherine | Depositions | Call with client about contacting Papito Momplaisir for rescheduling deposition | 0.10 | 350 | 35.00 | 35.00 |
| 12/15/2022 | E. Catherine | Depositions | Calling Papito to reschedule deposition. Left VM | 0.10 | 350 | 35.00 | 35.00 |
| 12/15/2022 | E. Catherine | Depositions | Drafting deposition outline for Yosmaily Ventura | 0.40 | 350 | 140.00 | 140.00 |
| 12/15/2022 | E. Catherine | Discovery | Drafting demand to opposing counsel for court conference on motion to amend, discovery, | 0.20 | 350 | 70.00 | 70.00 |
| 12/16/2022 | A. Keshavarz | AC | Review and revised proposed SAC. | 0.30 | 550 | 165.00 | 165.00 |
| 12/16/2022 | A. Keshavarz | Depositions | Went to court reporting agency address to see if the witness showed up for deposition. She did not. | 0.50 | 550 | 275.00 | 275.00 |
| 12/16/2022 | A. Keshavarz | Discovery | Review and revised correspondence with opposing counsel. Call to opposing counsel, and to court, not available. Correspondence with court and opposing counsel to set time for call with court. | 0.40 | 550 | 220.00 | 220.00 |
| 12/16/2022 | E. Catherine | AC | Drafting second amended complaint to add Yosmaily Ventura | 0.40 | 350 | 140.00 | 140.00 |
| 12/16/2022 | E. Catherine | Discovery | Drafting subpoena to empire hyundai for information about Yosmaily Ventura. | 0.40 | 350 | 140.00 | 140.00 |
| 12/16/2022 | E. Catherine | Discovery | Drafting oral arguments for call with court on motion to amend, extending discovery deadline | 1.00 | 350 | 350.00 | 350.00 |
| 12/16/2022 | E. Catherine | Discovery | Application to court for leave to amend and extending discovery deadline by 30 days. | 0.20 | 350 | 70.00 | 70.00 |
| 12/16/2022 | E. Catherine | Discovery | Pulling together all the false representations concealing Yosmaily Ventura | 2.80 | 350 | 980.00 | 980.00 |
| 12/19/2022 | A. Keshavarz | Discovery | Communications with process servers regarding service of subpoena on Empire Hyundai. The staff there says they are not authorized to accept service, gave alternative address of their "corporate office" where service would be accepted. Had new process server attempt service at that address. | 0.30 | 550 | 165.00 | 165.00 |
| 12/20/2022 | A. Keshavarz | Discovery | Prepared for telephone call with chambers regarding motion amend, enlarge time for discovery, and preparation for the same. | 2.20 | 550 | 1,210.00 | 1,210.00 |
| 12/20/2022 | A. Keshavarz | Discovery | Correspondence from in-house counsel for car dealership that is the prior employer Ventura. | 0.10 | 550 | 55.00 | 55.00 |
| 12/21/2022 | A. Keshavarz | Depositions | Issued new subpoena for deposition of Ventura based upon information provided by prior employer. Communications with process server regarding the same. | 0.30 | 550 | 165.00 | 165.00 |
| 12/21/2022 | A. Keshavarz | Depositions | Preparation for deposition of Papito Momplaisir. Meeting with Papito Momplaisir. | 3.10 | 550 | 1,705.00 | 1,705.00 |

| | | | | | | | |
|------------|--------------|-------------|--|------|-----|----------|----------|
| 12/22/2022 | A. Keshavarz | Depositions | Deposition of Papito Momplaisir, and brief pre-deposition call regarding the same. | 2.60 | 550 | 1,430.00 | 1,430.00 |
| 01/03/2023 | A. Keshavarz | Discovery | Call with witness. Review and revised proposed subpoena. | 0.40 | 550 | 220.00 | 220.00 |
| 01/03/2023 | A. Keshavarz | Discovery | Review and revised answers to discovery demands. | 0.30 | 550 | 165.00 | 165.00 |
| 01/03/2023 | E. Catherine | Discovery | Drafting responses to Defendants' second set of document requests | 0.30 | 350 | 105.00 | 105.00 |
| 01/04/2023 | A. Keshavarz | Discovery | Call to court to authorize alternative service on witness, and preparation for the same. Type up outline of argument, timeline of attempts to serve, and reviewed supporting affidavits of attempt. Reviewed excerpt of court decision authorizing alternative service. Review and revised proposed order. | 1.10 | 550 | 605.00 | 605.00 |
| 01/04/2023 | E. Catherine | Discovery | Drafting proposed order for alternative service of subpoena on Yosmaily Ventura | 0.60 | 350 | 210.00 | 210.00 |
| 01/04/2023 | E. Catherine | Discovery | Research on subpoena service by email or text. Application to court for alternative service | 0.50 | 350 | 175.00 | 175.00 |
| 01/05/2023 | A. Keshavarz | Discovery | Correspondence to Yosmaily Ventura. | 0.30 | 550 | 165.00 | 165.00 |
| 01/05/2023 | Para by Atty | Discovery | Scheduling court reporter for Yosmaily Ventura | 0.10 | 100 | 10.00 | 10.00 |
| 01/06/2023 | A. Keshavarz | Depositions | In person deposition of Ventura. Witness no-showed. | 0.50 | 550 | 275.00 | 275.00 |
| 01/06/2023 | E. Catherine | Depositions | Preparing for deposition of Yosmaily Ventura, updating timeline in outline | 0.90 | 350 | 315.00 | 315.00 |
| 01/09/2023 | A. Keshavarz | Discovery | Discovery telephone call related to Ventura, and preparation for the same. | 1.70 | 550 | 935.00 | 935.00 |
| 01/18/2023 | A. Keshavarz | Discovery | Analyzed their proposed stipulation and Reviewed order on motion to dismiss. Outlined how it effects our moving forward. | 0.70 | 550 | 385.00 | 385.00 |
| 01/24/2023 | A. Keshavarz | MTD | Reviewing order on motion to dismiss | 0.80 | 550 | 440.00 | 440.00 |
| 01/24/2023 | E. Catherine | MTD | Correspondence with opposing counsel. | 0.30 | 350 | 105.00 | 105.00 |
| 02/03/2023 | A. Keshavarz | Discovery | Research on settlement issue. | 0.50 | 550 | 275.00 | 275.00 |
| 02/03/2023 | A. Keshavarz | Settlement | Review and revised our 2nd amended initial disclosures. Reviewed document production and deposition | 0.50 | 550 | 275.00 | 275.00 |
| 02/08/2023 | A. Keshavarz | Depositions | Letter to opposing counsel again suggesting mediation. | 1.90 | 550 | 1,045.00 | 1,045.00 |
| 02/08/2023 | A. Keshavarz | Settlement | Identifying additional witnesses | 0.80 | 550 | 440.00 | 440.00 |
| 02/08/2023 | E. Catherine | Discovery | Letter to opposing counsel replying to e-mail and again requesting mediation. | 0.70 | 350 | 245.00 | 245.00 |
| 02/22/2023 | A. Keshavarz | Settlement | Preliminary review of MOL for MSJ and supporting evidence in their 56.1 Statement, affidavits. Note | 0.30 | 550 | 165.00 | 165.00 |
| 02/27/2023 | A. Keshavarz | MSJ | Reading Defendants' MSJ, drafting our 56.1 | 3.80 | 550 | 2,090.00 | 2,090.00 |
| 02/28/2023 | E. Catherine | MSJ | Determine if there are facts cited to in the MOL that are not in the 56.1. | 3.10 | 350 | 1,085.00 | 1,085.00 |
| 03/02/2023 | E. Catherine | MSJ | Going through deposition transcripts for facts to put in our 56.1 statement | 1.70 | 350 | 595.00 | 595.00 |
| 03/02/2023 | E. Catherine | MSJ | | 2.40 | 350 | 840.00 | 840.00 |

| | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|----------|
| 03/03/2023 | A. Keshavarz | Other | Correspondence with client. | 0.30 | 550 | 165.00 | 165.00 |
| 03/03/2023 | A. Keshavarz | MSJ | Reviewed facts alleged in the Defendants MOL that were not listed in their 56.1 statement. Drafted | 1.20 | 550 | 660.00 | 660.00 |
| 03/03/2023 | E. Catherine | MSJ | Drafting 56.1 | 4.00 | 350 | 1,400.00 | 1,400.00 |
| 03/03/2023 | E. Catherine | MSJ | Drafting introduction to the Memo of Law in opp to the MSJ; outlining the MOL for opp to MSJ | 1.10 | 350 | 385.00 | 385.00 |
| 03/06/2023 | A. Keshavarz | MSJ | Correspondence with opposing counsel regarding resolving Rule 56.1 statement issue. | 0.20 | 550 | 110.00 | 110.00 |
| 03/06/2023 | E. Catherine | MSJ | Adding a section to 56.1 counterstatement listing the factual statements Defendants put in their MO | 0.30 | 350 | 105.00 | 105.00 |
| 03/06/2023 | E. Catherine | MSJ | Outlining memorandum of law for opposition to MSJ | 0.40 | 350 | 140.00 | 140.00 |
| 03/06/2023 | E. Catherine | MSJ | Going through David Perez deposition transcript and adding content to the 56.1 statement | 6.10 | 350 | 2,135.00 | 2,135.00 |
| 03/07/2023 | E. Catherine | MSJ | Going through Stavros Orsaris deposition transcript for 56.1 statement | 4.30 | 350 | 1,505.00 | 1,505.00 |
| 03/08/2023 | A. Keshavarz | MSJ | Went through deposition of client for contra to their 56.1 statement of facts, and integrated count | 6.10 | 550 | 3,355.00 | 3,355.00 |
| 03/08/2023 | E. Catherine | MSJ | Organizing exhibits for Opp to MSJ | 0.60 | 350 | 210.00 | 210.00 |
| 03/08/2023 | E. Catherine | MSJ | Going through Stavros deposition for 56.1 | 0.50 | 350 | 175.00 | 175.00 |
| 03/08/2023 | E. Catherine | MSJ | Reading Papito's deposition transcript and adding to 56.1 | 1.50 | 350 | 525.00 | 525.00 |
| 03/08/2023 | E. Catherine | MSJ | Research on FCRA willfulness | 4.30 | 350 | 1,505.00 | 1,505.00 |
| 03/09/2023 | A. Keshavarz | MSJ | Continued integrating testimony of Ms. Francois into response to their 56.1 statement and for 56.1 | 1.40 | 550 | 770.00 | 770.00 |
| 03/09/2023 | E. Catherine | Depositions | Finish going through Stavros Orsaris deposition transcript | 3.60 | 350 | 1,260.00 | 1,260.00 |
| 03/09/2023 | E. Catherine | MSJ | Reviewing transcript of depo of Yessica Vallejo and adding to 56.1 | 2.90 | 350 | 1,015.00 | 1,015.00 |
| 03/09/2023 | E. Catherine | MSJ | Going through deposition transcript of Jami Singer and adding to 56.1 | 0.50 | 350 | 175.00 | 175.00 |
| 03/10/2023 | E. Catherine | MSJ | Going through Vallejo deposition transcript and adding to 56.1 | 2.10 | 350 | 735.00 | 735.00 |
| 03/10/2023 | E. Catherine | MSJ | Going through Diane Argyropoulos deposition transcript and adding to 56.1 | 4.00 | 350 | 1,400.00 | 1,400.00 |
| 03/13/2023 | A. Keshavarz | MSJ | Review and revised 56.1 counterstatement drafted by Emma. | 4.50 | 550 | 2,475.00 | 2,475.00 |
| 03/13/2023 | E. Catherine | MSJ | Research on impermissible pull and impermissible use violations and emotional distress damages | 2.10 | 350 | 735.00 | 735.00 |
| 03/13/2023 | E. Catherine | MSJ | Adding Ms. Francois deposition testimony to 56.1, adding any remaining documentary evidence, finali | 6.10 | 350 | 2,135.00 | 2,135.00 |
| 03/14/2023 | A. Keshavarz | MSJ | Worked on MSJ Opposition. Review and revised 76 pages of 56.1 statement document. Calls with client | 3.20 | 550 | 1,760.00 | 1,760.00 |
| 03/14/2023 | A. Keshavarz | MSJ | Worked on reframing argument, clarifying damages model, as to MOL, partially as to causation of dam | 6.20 | 550 | 3,410.00 | 3,410.00 |
| 03/14/2023 | E. Catherine | MSJ | Drafting MOL - research on damages from impermissible pulls | 1.80 | 350 | 630.00 | 630.00 |
| 03/14/2023 | E. Catherine | MSJ | Research for emotional distress for negligence | 0.10 | 350 | 35.00 | 35.00 |

| | | | | | | | |
|------------|--------------|-------|--|-------|-----|----------|----------|
| 03/14/2023 | E. Catherine | MSJ | MOL in opp to MSJ. Drafting section on economic damages flowing from negligence. Drafting section on willfulness. Drafting section on liability of VAG and Diane | 6.70 | 350 | 2,345.00 | 2,345.00 |
| 03/14/2023 | E. Catherine | MSJ | Adding additional facts need for MOL into 56.1, especially as to causation. | 1.60 | 350 | 560.00 | 560.00 |
| 03/15/2023 | A. Keshavarz | MSJ | Review and revised MOL in opposition to their MSJ. Final review of 56 statement before filing. | 10.90 | 550 | 5,995.00 | 5,995.00 |
| 03/15/2023 | E. Catherine | MSJ | Reviewing affidavit by client for opp to MSJ | 0.40 | 350 | 140.00 | 140.00 |
| 03/15/2023 | Para by Atty | MSJ | Preparing exhibits for opp to msj to file - redacting social security numbers, resizing and ocring | 3.20 | 100 | 320.00 | 320.00 |
| 03/15/2023 | E. Catherine | MSJ | Finalizing 56.1 statement in opp to msj | 1.70 | 350 | 595.00 | 595.00 |
| 03/15/2023 | E. Catherine | MSJ | Adding facts about Victory Mitsubishi retaining the loan to 56.1, finalizing 56.1. Drafting declaration in opp to msj | 2.60 | 350 | 910.00 | 910.00 |
| 03/15/2023 | E. Catherine | MSJ | Drafting statement of facts for MOL in opp to msj | 1.63 | 350 | 570.50 | 570.50 |
| 03/15/2023 | E. Catherine | MSJ | Reviewing Ahmad edits to the MOL | 3.30 | 350 | 1,155.00 | 1,155.00 |
| 03/16/2023 | E. Catherine | MSJ | Downloading, merging, and OCRing filings in opp to MSJ | 1.00 | 350 | 350.00 | 350.00 |
| 03/16/2023 | E. Catherine | MSJ | Finalizing memorandum of law and filing | 0.30 | 350 | 105.00 | 105.00 |
| 03/17/2023 | A. Keshavarz | MSJ | Correspondence with opposing counsel regarding setting up time to speak with court. | 0.20 | 550 | 110.00 | 110.00 |
| 03/20/2023 | A. Keshavarz | MSJ | Prepared for call with court for their objection to our 56.1 statement. | 1.50 | 550 | 825.00 | 825.00 |
| 03/21/2023 | A. Keshavarz | MSJ | Reviewed Our MOL to insert a few paragraph citations in the MOL that were in the 56.1 statement but | 0.70 | 550 | 385.00 | 385.00 |
| 03/23/2023 | A. Keshavarz | MSJ | Worked on issue of redactions of exhibits being "locked". Correspondence with opposing counsel and | 1.40 | 550 | 770.00 | 770.00 |
| 03/27/2023 | A. Keshavarz | MSJ | Further locked down redactions requested by opposing counsel. | | | | |
| 04/03/2023 | A. Keshavarz | MSJ | Correspondence with opposing counsel and court regarding the same. | 1.20 | 550 | 660.00 | 660.00 |
| 04/03/2023 | A. Keshavarz | Trial | Submitted request to bring electronic devices to court hearing, | 0.10 | 550 | 55.00 | 55.00 |
| 04/03/2023 | Para by Atty | MSJ | Re-filed redacted exhibits. | 0.70 | 100 | 70.00 | 70.00 |
| 04/03/2023 | E. Catherine | MSJ | Reading reply in support of their MSJ, drafting outline for oral arguments | 1.90 | 350 | 665.00 | 665.00 |
| 04/03/2023 | E. Catherine | MSJ | Research on forgery and question of fact under Rule 56 | 0.30 | 350 | 105.00 | 105.00 |
| 04/04/2023 | E. Catherine | MSJ | Prepping for oral arguments - worked on finishing lengthy, detailed oral argument outline. | 5.80 | 350 | 2,030.00 | 2,030.00 |
| 04/05/2023 | A. Keshavarz | MSJ | Reviewed issue of citation to 1681o they obliquely reference in their MSJ. Research on the issue. Review and revised correspondence to opposing counsel with proposed revised complaint. | 1.10 | 550 | 605.00 | 605.00 |
| 04/05/2023 | A. Keshavarz | MSJ | Review and revised outline for oral argument. | 7.90 | 550 | 4,345.00 | 4,345.00 |
| 04/05/2023 | E. Catherine | MSJ | Adding to the outline the key points that Defendants did not address in the MSJ or Reply | 2.10 | 350 | 735.00 | 735.00 |

| | | | | | | | | |
|------------|--------------|----------------|--|------|-----|----------|-----------|----------|
| 04/05/2023 | E. Catherine | MSJ | Reviewing Ahmad edits to the outline for MSJ oral arguments | 2.90 | 350 | 1,015.00 | | 1,015.00 |
| 04/06/2023 | A. Keshavarz | MSJ | Correspondence with court as to re-scheduling oral argument. | 0.10 | 550 | 55.00 | | 55.00 |
| 04/06/2023 | A. Keshavarz | MSJ | Correspondence to opposing counsels and voicemail messages to them regarding call to court on amend | 0.30 | 550 | 165.00 | | 165.00 |
| 04/06/2023 | E. Catherine | MSJ | Adding Ahmad edits to oral arguments outline, reading through outline to estimate time. | 3.50 | 350 | 1,225.00 | | 1,225.00 |
| 04/07/2023 | A. Keshavarz | MSJ | Morning of review and revision of oral argument outline. Mock oral argument. Oral argument. | 8.90 | 550 | 4,895.00 | -1,100.00 | 3,795.00 |
| 04/07/2023 | E. Catherine | MSJ | Day of preparation for MSJ Oral arguments. Final oral outline revisions, review motion MOLs. Oral argument itself. | 5.70 | 350 | 1,995.00 | | 1,995.00 |
| 05/15/2023 | E. Catherine | Other | Call with Department of Finance. | 0.10 | 350 | 35.00 | | 35.00 |
| 06/05/2023 | A. Keshavarz | Other | Call with client. | 0.40 | 550 | 220.00 | | 220.00 |
| 07/13/2023 | A. Keshavarz | MSJ | Analysis of summary judgment order. Outlined next steps, strategy going forward with trial. | 1.90 | 550 | 1,045.00 | | 1,045.00 |
| 07/13/2023 | E. Catherine | Other | Call with client, wanted update on status of case | 0.20 | 350 | 70.00 | | 70.00 |
| 07/13/2023 | E. Catherine | MSJ | Reading, analysis of Motion for Summary Judgment Order | 0.50 | 350 | 175.00 | | 175.00 |
| 07/14/2023 | A. Keshavarz | Reconsideratic | Review and revised correspondence with opposing counsels regarding their request for reconsideratio | 0.50 | 550 | 275.00 | | 275.00 |
| 07/17/2023 | A. Keshavarz | Reconsideratic | Prepared for call to chambers. Reviewed order, account pull history. Call with chambers. Post call | 1.50 | 550 | 825.00 | | 825.00 |
| 08/02/2023 | E. Catherine | MSJ | Reading memo of law in support of reconsideration of msj | 0.20 | 350 | 70.00 | | 70.00 |
| 08/03/2023 | A. Keshavarz | Reconsideratic | Preliminary review of their motion for reconsideration. Sketched out responses, counter arguments. | 2.50 | 550 | 1,375.00 | | 1,375.00 |
| 08/03/2023 | E. Catherine | Reconsideratic | Outlining arguments in opposition to motion to reconsideration | 1.90 | 350 | 665.00 | | 665.00 |
| 08/04/2023 | E. Catherine | Reconsideratic | Drafting opposition to motion for reconsideration | 2.40 | 350 | 840.00 | | 840.00 |
| 08/07/2023 | A. Keshavarz | Reconsideratic | Review and revised opposition to their motion for reconsideration. | 1.30 | 550 | 715.00 | | 715.00 |
| 08/07/2023 | E. Catherine | Reconsideratic | Reviewing Ahmad comments in opposition to reconsideration, revising accordingly | 1.10 | 350 | 385.00 | | 385.00 |
| 08/14/2023 | A. Keshavarz | Reconsideratic | Review and revised our Francois opposition to motion for reconsideration. | 2.80 | 550 | 1,540.00 | | 1,540.00 |
| 08/14/2023 | E. Catherine | Reconsideratic | Reviewing Ahmad additions and revisions to opp to motion for reconsideration | 0.60 | 350 | 210.00 | | 210.00 |
| 08/14/2023 | E. Catherine | Reconsideratic | Reviewing Ahmad's revisions to the opp to reconsider | 0.20 | 350 | 70.00 | | 70.00 |
| 09/15/2023 | E. Catherine | Other | Gave client status update on case over phone | 0.10 | 350 | 35.00 | | 35.00 |
| 02/02/2024 | A. Keshavarz | Reconsideratic | Read and analyzed order denying motion for reconsideration. | 0.90 | 550 | 495.00 | | 495.00 |
| 02/05/2024 | A. Keshavarz | Other | Call with client, updating her on status, asked about trial and witness availability. | 0.60 | 550 | 330.00 | | 330.00 |
| 02/05/2024 | A. Keshavarz | Settlement | Review and revised correspondence with opposing counsel regarding mediation. | 0.30 | 550 | 165.00 | | 165.00 |
| 02/05/2024 | A. Keshavarz | Trial | Outlined witnesses needed for trial, estimated trial length. | 0.80 | 550 | 440.00 | | 440.00 |
| 02/05/2024 | E. Catherine | Settlement | Draft mediation demand letter | 0.20 | 350 | 70.00 | | 70.00 |

| | | | | | | | |
|------------|--------------|------------|--|------|-----|----------|-----------|
| 02/07/2024 | A. Keshavarz | Settlement | Review and revised correspondence with opposing counsels regarding mediation, trial dates. Call wi | 1.10 | 550 | 605.00 | 605.00 |
| 05/01/2024 | A. Keshavarz | Settlement | Review and revised mediation letter to opposing counsel. | 0.60 | 550 | 330.00 | 330.00 |
| 05/01/2024 | E. Caterine | Settlement | Drafting letter making final demand for mediation | 0.60 | 350 | 210.00 | 210.00 |
| 05/01/2024 | E. Caterine | Settlement | Reviewing ahmad edits to demand for mediation letter and finalizing | 0.10 | 350 | 35.00 | 35.00 |
| 05/02/2024 | A. Keshavarz | Settlement | Reviewed correspondence from opposing counsel. Review and revised correspondence with mediator. | 0.40 | 550 | 220.00 | 220.00 |
| 05/10/2024 | E. Caterine | Other | Call with client to discuss mediation | 0.10 | 350 | 35.00 | 35.00 |
| 05/22/2024 | E. Caterine | Settlement | Drafting mediation statement | 0.90 | 350 | 315.00 | 315.00 |
| 05/24/2024 | E. Caterine | Settlement | Drafting mediation statement | 3.10 | 350 | 1,085.00 | 1,085.00 |
| 05/29/2024 | A. Keshavarz | Settlement | Review and revised mediation statement. Call with client. | 5.50 | 550 | 3,025.00 | 3,025.00 |
| 05/29/2024 | E. Caterine | Settlement | Reviewing Ahmad edits to the mediation letter | 0.40 | 350 | 140.00 | 140.00 |
| 05/30/2024 | E. Caterine | Settlement | Sending mediation statement to mediator and opposing counsel | 0.10 | 350 | 35.00 | 35.00 |
| 06/03/2024 | A. Keshavarz | Other | Call with client regarding mediation process. | 0.60 | 550 | 330.00 | 330.00 |
| 06/10/2024 | A. Keshavarz | Settlement | Preparation for ex parte call with mediator. Reviewed lengthy mediation statement. | 0.40 | 550 | 220.00 | 220.00 |
| 06/10/2024 | A. Keshavarz | Settlement | Ex parte call with mediator. | 1.00 | 550 | 550.00 | 550.00 |
| 06/12/2024 | A. Keshavarz | Other | Follow up call with client to discuss mediation. | 0.30 | 550 | 165.00 | 165.00 |
| 06/12/2024 | A. Keshavarz | Settlement | Correspondence with mediator throughout the day regarding the need for the owner of the dealership | 0.90 | 550 | 495.00 | 495.00 |
| 06/13/2024 | A. Keshavarz | Settlement | Lengthy all day mediation; pre-mediation preparation and post mediation follow up. | 8.00 | 550 | 4,400.00 | 4,400.00 |
| 06/13/2024 | E. Caterine | Settlement | Mediation (took part only part of the time). | 3.80 | 350 | 1,330.00 | -1,330.00 |
| 06/20/2024 | A. Keshavarz | Trial | Reviewed prior e-mail from opposing counsel stating they will have the general manager for the dealership be the "designated trial representative for all Defendants." Researched issue of requirements for individual defendants to appear at trial and whether, as they suggest, they can use a corporate representative to appear as the employee defendants. | 0.60 | 550 | 330.00 | 330.00 |
| 06/20/2024 | E. Caterine | Other | Calling client to check her availability for trial in November, December, January | 0.10 | 350 | 35.00 | 35.00 |
| 06/20/2024 | E. Caterine | Trial | Research on meaning of "designated trial representative." | 0.20 | 350 | 70.00 | 70.00 |
| 06/24/2024 | E. Caterine | Trial | Trial preparation - pre-trial rule 26 disclosures, joint consent order, research into Emmanuel Laforest deposition testimony admission, research into Admission of testimony re Chris Orsaris and his criminal record, research into whether there is a limit on how far ahead of time you can subpoena a witness for trial | 4.20 | 350 | 1,470.00 | 1,470.00 |
| 06/25/2024 | E. Caterine | Trial | Trial prep - FRE research for issue of Chris Orsaris evidence | 2.00 | 350 | 700.00 | 700.00 |
| 06/25/2024 | E. Caterine | Trial | Drafting evidence objection guide | 0.20 | 350 | 70.00 | 70.00 |

| | | | | | | | | |
|------------|--------------|------------|---|------|-----|----------|---------|----------|
| 06/25/2024 | E. Catherine | Trial | Call to chambers for Defendants to make application for pushing back trial, granted. | 0.20 | 350 | 70.00 | | 70.00 |
| 06/26/2024 | E. Catherine | Trial | Trial prep - organizing folders and outlining full list of items that need to be completed. Providing summary of work to Ahmad by email | 4.50 | 350 | 1,575.00 | | 1,575.00 |
| 06/26/2024 | E. Catherine | Trial | Drafting evidence checklists | 0.10 | 350 | 35.00 | | 35.00 |
| 06/26/2024 | E. Catherine | Trial | Asking Brendan Moriarty about his experience as a juror, what would be helpful, etc. | 0.30 | 350 | 105.00 | | 105.00 |
| 06/27/2024 | E. Catherine | Trial | Moving Samms trial materials to subfolder | 0.10 | 350 | 35.00 | | 35.00 |
| 06/27/2024 | E. Catherine | Trial | Providing Ahmad with analysis of why Laforest could be impeached using his criminal history | 0.20 | 350 | 70.00 | | 70.00 |
| 06/27/2024 | E. Catherine | Trial | Drafting evidence checklists | 0.50 | 350 | 175.00 | | 175.00 |
| 06/27/2024 | E. Catherine | Trial | Began dompiling disputed and undisputed facts for draft of joint pre-trial order | 2.70 | 350 | 945.00 | | 945.00 |
| 06/27/2024 | E. Catherine | Trial | Drafting subpoenas for witnesses to testify that need them | 0.90 | 350 | 315.00 | | 315.00 |
| 06/27/2024 | E. Catherine | Trial | Began outlining direct exam of Emmanuel Laforest | 0.40 | 350 | 140.00 | | 140.00 |
| 06/28/2024 | E. Catherine | Trial | Continued outlining direct examination of Laforest | 1.30 | 350 | 455.00 | | 455.00 |
| 07/01/2024 | E. Catherine | Trial | Responding to Ahmad's Sunday email asking about pattern and practice, impeachment, what to do if Laforest does not show up at trial. | 0.20 | 350 | 70.00 | | 70.00 |
| 07/01/2024 | E. Catherine | Trial | Continued drafting Emmanuel Laforest direct exam outline | 0.40 | 350 | 140.00 | | 140.00 |
| 07/01/2024 | E. Catherine | Trial | Began outlining Jami Singer direct examination outline if Laforest is a no-show | 0.40 | 350 | 140.00 | | 140.00 |
| 07/01/2024 | E. Catherine | Trial | Began drafting David Perez direct exam outline if Laforest is a no show | 1.20 | 350 | 420.00 | | 420.00 |
| 07/01/2024 | E. Catherine | Trial | Coming up with a clear timeline of May 30 for trial | 0.20 | 350 | 70.00 | | 70.00 |
| 07/17/2024 | A. Keshavarz | Other | Calls with client. | 0.70 | 550 | 385.00 | | 385.00 |
| 07/17/2024 | A. Keshavarz | Settlement | Call from mediator. | 0.40 | 550 | 220.00 | | 220.00 |
| 07/18/2024 | A. Keshavarz | Settlement | Correspondence with mediator. Lengthy call with mediator and preparation for the same. Follow up call with mediator, | 1.40 | 550 | 770.00 | | 770.00 |
| 07/18/2024 | A. Keshavarz | Other | Calls with client. | 0.30 | 550 | 165.00 | | 165.00 |
| 07/22/2024 | A. Keshavarz | Trial | Pretrial preparation. Went through outline of trial issues by E. Catherine. | 2.10 | 550 | 1,155.00 | -550.00 | 605.00 |
| 07/22/2024 | E. Catherine | Trial | Contnued frafting direct exam outline for Yessica Vallejo | 1.10 | 350 | 385.00 | | 385.00 |
| 07/22/2024 | E. Catherine | Trial | Drafting plain language recitation of our narrative to be used in drafting opening statement | 0.60 | 350 | 210.00 | | 210.00 |
| 07/22/2024 | E. Catherine | Trial | Organizing trial exhibits | 0.20 | 350 | 70.00 | | 70.00 |
| 07/22/2024 | E. Catherine | Trial | Reviewing trial prep checklist to determine what to prioritize in my last days | 0.10 | 350 | 35.00 | | 35.00 |
| 07/23/2024 | A. Keshavarz | Settlement | Returned call to mediator. Call with client. Call with mediator again. | 0.50 | 550 | 275.00 | | 275.00 |
| 07/23/2024 | A. Keshavarz | Other | Call with client. | 0.30 | 550 | 165.00 | | 165.00 |

| | | | | | | | |
|------------|--------------|------------|---|------|-----|----------|----------|
| 07/23/2024 | A. Keshavarz | Trial | Confer with law partner regarding questions for witnesses at trial, how to approach the trial testi | 0.60 | 550 | 330.00 | 330.00 |
| 07/23/2024 | E. Catherine | Trial | Trial prep - david perez direct examination and Yessica Vallejo direct examination outlines | 4.20 | 350 | 1,470.00 | 1,470.00 |
| 07/23/2024 | E. Catherine | Trial | Drafting an outline of which documents relate to which defendants | 1.00 | 350 | 350.00 | 350.00 |
| 07/24/2024 | A. Keshavarz | Settlement | Call with mediator. | 0.50 | 550 | 275.00 | 275.00 |
| 07/24/2024 | E. Catherine | Trial | Yessica Vallejo direct examination outline | 2.90 | 350 | 1,015.00 | 1,015.00 |
| 07/24/2024 | E. Catherine | Trial | Drafting direct examination outline for Stavros Orsaris | 3.80 | 350 | 1,330.00 | 1,330.00 |
| 07/25/2024 | A. Keshavarz | Trial | Preliminary review of outline of direct testimony of dealership witnesses. | 1.40 | 550 | 770.00 | 770.00 |
| 07/25/2024 | E. Catherine | Trial | Began drafting outline for Stavros Orsaris direct exam | 1.50 | 350 | 525.00 | 525.00 |
| 07/25/2024 | E. Catherine | Trial | Organizing business record affidavits and determining if they are in compliance with FRE | 0.40 | 350 | 140.00 | 140.00 |
| 07/26/2024 | E. Catherine | Trial | Rule 26 pretrial disclosures | 1.60 | 350 | 560.00 | 560.00 |
| 07/29/2024 | A. Keshavarz | Settlement | Call with mediator. | 0.20 | 550 | 110.00 | 110.00 |
| 07/29/2024 | A. Keshavarz | Other | Calls with client throughout the day. | 0.80 | 550 | 440.00 | 440.00 |
| 07/30/2024 | A. Keshavarz | Trial | Correspondence with counsel for Capital One regarding business records affidavits. Reviewed affidavit for compliance with FDCPA. Served business records affidavits on opposing counsels for documents previously produced. | 0.20 | 550 | 110.00 | 110.00 |
| 07/31/2024 | A. Keshavarz | Settlement | Call from mediator. | 0.30 | 550 | 165.00 | 165.00 |
| 08/09/2024 | A. Keshavarz | Trial | Drafted trial multiple subpoenas for multiple trial witnesses and forwarded them to process server to be served. | 1.10 | 550 | 605.00 | 605.00 |
| 08/09/2024 | A. Keshavarz | Settlement | Reviewed correspondence from opposing counsel. | 0.10 | 550 | 55.00 | 55.00 |
| 9/9/2024 | A. Keshavarz | Other | Call with client. | 0.7 | 550 | 385.00 | 385.00 |
| 08/14/2024 | A. Keshavarz | Trial | Notice of appearance by of counsel to firm of defendant. They requested a trial adjournment which I consented to. Multiple calls with incoming counsel and opposing counsel. Call to chambers regarding the same. Post-hearing calls with opposing counsels. Reviewed prior orders as to trial dates. Follow up call with court with all counsel on the line. | 2.00 | 550 | 1,100.00 | 1,100.00 |
| 08/28/2024 | A. Keshavarz | Trial | Re-issued witness subpoenas. | 0.30 | 550 | 165.00 | 165.00 |
| 08/28/2024 | N. Moore | Trial | Drafted new set of subpoenas, printed and scanned trial subpoenas signed subpoenas to process server. | 1.40 | 100 | 140.00 | 140.00 |
| 08/29/2024 | A. Keshavarz | Trial | Call with client. Communication with process server. | 0.30 | 550 | 165.00 | 165.00 |
| 08/29/2024 | N. Moore | Trial | Research on federal rules re witness fees, per diem, mileage: rates and procedures for fees served | 1.40 | 100 | 140.00 | 140.00 |
| 09/09/2024 | A. Keshavarz | Settlement | Reached out to mediator. | 0.10 | 550 | 55.00 | 55.00 |
| 09/11/2024 | A. Keshavarz | Settlement | Call with mediator. | 0.40 | 550 | 220.00 | 220.00 |
| 09/26/2024 | A. Keshavarz | Settlement | Research on offer of judgment issue regarding fees to date. | 2.10 | 550 | 1,155.00 | 1,155.00 |
| 09/26/2024 | A. Keshavarz | Settlement | Call and emails with mediator. | 0.90 | 550 | 495.00 | 495.00 |

| | | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|---------|----------|
| 09/26/2024 | A. Keshavarz | Trial | Correspondence to opposing counsel regarding his clients and employees at dealership dodging service of trial subpoenas. | 0.30 | 550 | 165.00 | | 165.00 |
| 09/27/2024 | A. Keshavarz | Trial | Call with client, | 0.10 | 550 | 55.00 | | 55.00 |
| 09/30/2024 | A. Keshavarz | Trial | Correspondence with opposing counsel about call with chambers we are supposed to have. They will not make themselves available for the call. | 0.50 | 550 | 275.00 | | 275.00 |
| 09/30/2024 | A. Keshavarz | Trial | Correspondence with opposing counsel regarding call with court for order on service. | 0.40 | 550 | 220.00 | | 220.00 |
| 10/04/2024 | A. Keshavarz | Trial | Call with client. | 0.10 | 550 | 55.00 | | 55.00 |
| 10/07/2024 | A. Keshavarz | Settlement | Call with client. Calls with mediator. Drafted and circulated settlement offer. | 0.70 | 550 | 385.00 | | 385.00 |
| 10/07/2024 | A. Keshavarz | Trial | Worked on Rule 26 disclosures | 1.70 | 550 | 935.00 | | 935.00 |
| 10/08/2024 | N. Moore | Trial | Research on motion in limine | 0.50 | 100 | 50.00 | | 50.00 |
| 10/09/2024 | A. Keshavarz | Trial | Reviewed correspondence with new counsel for dealership. Call with arbitrator regarding the same and regarding negotiation status. | 0.30 | 550 | 165.00 | | 165.00 |
| 10/11/2024 | A. Keshavarz | Settlement | Correspondence and call with mediator regarding settlement negotiation status. | 0.20 | 550 | 110.00 | | 110.00 |
| 10/15/2024 | A. Keshavarz | Settlement | Call to mediator regarding settlement status. | 0.10 | 550 | 55.00 | | 55.00 |
| 10/15/2024 | A. Keshavarz | Trial | Followed up regarding tracking down LaForest for subpoena. Worked on lining up trial witnesses. | 1.60 | 550 | 880.00 | | 880.00 |
| 10/15/2024 | N. Moore | Trial | Preparing new set of trial subpoenas given difficulties with services on trial witnesses. Review complaints/suits filed against Spartan. Continued attempts to track down potential trial witnesses. | 1.70 | 100 | 170.00 | | 170.00 |
| 10/16/2024 | A. Keshavarz | Depositions | Continued working on 26 disclosures, exhibits, potential reference to deposition testimony. | 1.60 | 550 | 880.00 | | 880.00 |
| 10/16/2024 | A. Keshavarz | Trial | Pre-trial preparations regarding additional trial subpoenas, trial witnesses. Contact with process | 0.80 | 550 | 440.00 | -440.00 | - |
| 10/16/2024 | N. Moore | Settlement | Settlement conversation with Paul | 0.30 | 100 | 30.00 | -30.00 | - |
| 10/16/2024 | N. Moore | Trial | Begin locating trial exhibits and sorting into new folders | 1.60 | 100 | 160.00 | | 160.00 |
| 10/16/2024 | N. Moore | Trial | Prepare all trial subpoenas for 5th round of subpoenas and get ready for mailing. | 1.90 | 100 | 190.00 | | 190.00 |
| 10/16/2024 | N. Moore | Trial | Went to post office to mail subpoenas | 0.40 | 100 | 40.00 | | 40.00 |
| 10/17/2024 | A. Keshavarz | Trial | Trial preparation. Went through deposition transcript of LaForest for page and line number designations for our Rule 26 disclosures. Supervision of organizing exhibit designations for Rule 26 disclosures, correlating exhibits from MSJ and depositions. | 2.20 | 550 | 1,210.00 | | 1,210.00 |
| 10/17/2024 | A. Keshavarz | Trial | Work on preliminary jury charge issues. Preliminary research of standards and definitions for key issues as to damages, FCRA impermissible access definition, and negligent v. willful FCRA violations. Call with FCRA trial experts on these jury charge issues, general trial strategy. | 4.70 | 550 | 2,585.00 | | 2,585.00 |

| | | | | | | | | |
|------------|--------------|-------|--|------|-----|----------|-----------|----------|
| 10/17/2024 | N. Moore | Trial | Discuss exhibits with AK. Continue working on trial exhibits | 1.50 | 100 | 150.00 | -30.00 | 120.00 |
| 10/17/2024 | N. Moore | Trial | Organizing all trial exhibits | 4.10 | 100 | 410.00 | | 410.00 |
| 10/18/2024 | A. Keshavarz | Trial | Supervised and assisted with determination of which documents to use as exhibits, reviewing large volume of documents to make determinations. (Plaintiff's production was over 3,500 pages, document subpoena responses from Dealertack, Capital One Auto Finance, and the credit reporting agencies where several hundred pages of sometimes very dense information). | 4.30 | 550 | 2,365.00 | | 2,365.00 |
| 10/18/2024 | A. Keshavarz | Trial | Continued working on jury instructions. Began pulling together instruction language from Model Instruction treatises. Preliminary pulling together of instructions generally as to actual and punitive damages. | 4.10 | 550 | 2,255.00 | | 2,255.00 |
| 10/18/2024 | N. Moore | Trial | Continue sorting exhibits and adding to table. Tracked down Bates stamped versions | 1.10 | 100 | 110.00 | -110.00 | - |
| 10/18/2024 | N. Moore | Trial | Working on jury charge | 1.70 | 100 | 170.00 | -170.00 | - |
| 10/18/2024 | N. Moore | Trial | Go through all of our production and extract each individual document, then rename and sort all. | 4.10 | 100 | 410.00 | | 410.00 |
| 10/19/2024 | A. Keshavarz | Trial | Worked on damages section of jury instruction as to emotional distress damages specifically, specific language that may go in as to specific manifestations of emotional distress (eg crying). Pulled language from rulings along with language supporting the same. | 4.70 | 550 | 2,585.00 | | 2,585.00 |
| 10/20/2024 | A. Keshavarz | Trial | Continued working on FCRA damages sections of jury charge, case law supporting the same, and effect of prior rulings on the same. | 5.90 | 550 | 3,245.00 | -1,430.00 | 1,815.00 |
| 10/20/2024 | N. Moore | Trial | General jury charge research. | 1.30 | 100 | 130.00 | -130.00 | - |
| 10/21/2024 | A. Keshavarz | Trial | Continued working on jury instructions as to damages. | 1.10 | 550 | 605.00 | -275.00 | 330.00 |
| 10/21/2024 | A. Keshavarz | Trial | Call with potential trial counsel. | 0.50 | 550 | 275.00 | | 275.00 |
| 10/21/2024 | A. Keshavarz | Trial | Went through trial exhibits, focused on which items we really needed, which ones to instruct N. Moore we will keep as backup exhibits, decided which pages of multi-page documents to use, which to discard. | 3.50 | 550 | 1,925.00 | | 1,925.00 |
| 10/21/2024 | N. Moore | Trial | Continue work on cataloguing and renaming exhibits | 4.10 | 100 | 410.00 | | 410.00 |
| 10/21/2024 | N. Moore | Trial | Work on jury charge - find and download jury charge treatise | 1.70 | 100 | 170.00 | -90.00 | 80.00 |

Continued working on Rule 26 disclosures as to how to present exhibits (redactions, copies of credit reports produced by the credit reporting agencies with a copy of the business records affidavit, or the version client actually had and reviewed; should be the same information, though). Read the documents for exhibits, organized or Rule 26 disclosures for introduction at trial. Consolidated and reordered third party subpoena responses to make exhibits make more sense in introduction. For example the Dealertack finance application report had documents in different orders throughout their production. Decided how to instruct N, Moore to organize for use to introduce as a single exhibit to which witness.

| | | | | | | | | |
|------------|--------------|-------------|---|------|-----|----------|-----------|----------|
| 10/22/2024 | A. Keshavarz | Trial | Continued working on Rule 26 disclosures as to how to present exhibits (redactions, copies of credit reports produced by the credit reporting agencies with a copy of the business records affidavit, or the version client actually had and reviewed; should be the same information, though). Read the documents for exhibits, organized or Rule 26 disclosures for introduction at trial. Consolidated and reordered third party subpoena responses to make exhibits make more sense in introduction. For example the Dealertack finance application report had documents in different orders throughout their production. Decided how to instruct N, Moore to organize for use to introduce as a single exhibit to which witness. | 6.90 | 550 | 3,795.00 | | 3,795.00 |
| 10/22/2024 | Para by Atty | Trial | Served and filed Rule 26(a)(3) disclosures. | 0.20 | 550 | 110.00 | | 110.00 |
| 10/22/2024 | N. Moore | Trial | Working on extracting, renaming, and sorting exhibits. Finalize document list. Go through other production to see what else to add as Exhibit. | 5.90 | 100 | 590.00 | | 590.00 |
| 10/23/2024 | A. Keshavarz | Settlement | Call with mediator. | 0.40 | 550 | 220.00 | | 220.00 |
| 10/23/2024 | N. Moore | Trial | Research on admitting business records under FRE | 1.40 | 100 | 140.00 | -140.00 | - |
| 10/24/2024 | N. Moore | Trial | Renaming all trial exhibits, extracting from merged production docs, checking Bates stamps, and putting into folder. | 4.10 | 100 | 410.00 | | 410.00 |
| 10/25/2024 | A. Keshavarz | Other | Lengthy calls with client throughout the day. | 1.9 | 550 | 1,045.00 | | 1,045.00 |
| 10/25/2024 | A. Keshavarz | Settlement | Calls with mediator about settlement. | 0.90 | 550 | 495.00 | | 495.00 |
| 10/25/2024 | A. Keshavarz | Trial | Conferred in person with potential co-counsel about joining case. Lengthy joint zoom meeting with client. Went through key issues in case. | 3.90 | 550 | 2,145.00 | | 2,145.00 |
| 10/25/2024 | N. Moore | Trial | Drafting motion in limine | 6.50 | 100 | 650.00 | -650.00 | - |
| 10/27/2024 | A. Keshavarz | Trial | Worked on additional pre-trial motions. | 1.70 | 550 | 935.00 | | 935.00 |
| 10/27/2024 | A. Keshavarz | Trial | Work onboarding trial counsel to the case. | 3.10 | 550 | 1,705.00 | -1,705.00 | - |
| 10/28/2024 | A. Keshavarz | Depositions | Brief review of conflicting deposition testimony of defendants as to certain issues. | 0.70 | 550 | 385.00 | | 385.00 |
| 10/28/2024 | N. Moore | Trial | Go through depo transcripts for S Orsaris, D Perez, Y Vallejos and highlighting paga and line numbers flagged by A. Keshavarz. | 2.10 | 100 | 210.00 | | 210.00 |
| 10/28/2024 | N. Moore | Trial | Drafted new version of motion in limine | 4.30 | 100 | 430.00 | -430.00 | - |
| 10/29/2024 | A. Keshavarz | Other | Call and communications with client throughout the day. | 1.10 | 550 | 605.00 | | 605.00 |
| 10/29/2024 | A. Keshavarz | Trial | Reviewed motion in limine itsems drafted by N. Moore. | 0.90 | 550 | 495.00 | -495.00 | - |
| 10/29/2024 | A. Keshavarz | Trial | Call with trial counsel. | 0.20 | 550 | 110.00 | -110.00 | - |
| 10/29/2024 | N. Moore | Trial | Proofreading for final draft of mot in limine; then fixed various formatting issues and added table of contents | 1.70 | 100 | 170.00 | | 170.00 |
| 10/30/2024 | A. Keshavarz | Trial | Contacted process server regarding service on Dealertrack custodian of records. | 0.20 | 550 | 110.00 | | 110.00 |
| 10/30/2024 | A. Keshavarz | Trial | Worked on proposed joint pretrial order. | 6.90 | 550 | 3,795.00 | | 3,795.00 |

| | | | | | | | |
|-------------------------|------------|---|------|-----|----------|-----------|----------|
| 10/30/2024 J. Miller | Trial | Preparation for drafting jury charge. Familiarized myself with case by reading pleadings and orders | 3.00 | 375 | 1,125.00 | -1,125.00 | - |
| 10/30/2024 N. Moore | Trial | Find out requirements for pro hac vice admission for A. Milz. Draft required documents for pro hac | 1.50 | 100 | 150.00 | | 150.00 |
| 10/31/2024 A. Keshavarz | Other | Communications with client. | 0.20 | 550 | 110.00 | | 110.00 |
| 10/31/2024 A. Keshavarz | Trial | Worked on final issues regarding PHV; worked on tech issues for trial. | 0.40 | 550 | 220.00 | -55.00 | 165.00 |
| 10/31/2024 A. Keshavarz | Trial | Continued working on joint pretrial order. Exhibits and witnesses. | 5.50 | 550 | 3,025.00 | -550.00 | 2,475.00 |
| 10/31/2024 J. Miller | Trial | Draft and file notice of appearance | 0.10 | 375 | 37.50 | -37.50 | - |
| 10/31/2024 J. Miller | Trial | Finished familiarizing myself with case file in preparation for drafting jury charge -- remaining depositions and discovery produced in case | 1.70 | 375 | 637.50 | -637.50 | - |
| 10/31/2024 J. Miller | Trial | Examining model jury instructions and sample jury charges from other FCRA cases in preparation for drafting jury charge | 0.80 | 375 | 300.00 | -300.00 | - |
| 10/31/2024 J. Miller | Trial | Researched law on emotional distresses from 2d Cir COA (esp. Casella) and district courts in 2d Cir. Collected favorable language from cases for use in jury charge section on emotional distress. | 5.10 | 375 | 1,912.50 | -750.00 | 1,162.50 |
| 10/31/2024 J. Miller | Trial | Begin revising jury charge drafted by AK to that point, especially as to emotional distress issue. Edited for clarity. | 3.00 | 375 | 1,125.00 | -600.00 | 525.00 |
| 11/01/2024 A. Keshavarz | Settlement | E-mail from opposing counsel regarding settlement. Calls with mediator, co-counsel, client throughout the day regarding the same. Worked on settlement issues. Drafted proposed settlement language and terms for mediator. | 4.20 | 550 | 2,310.00 | -750.00 | 1,560.00 |
| 11/01/2024 A. Keshavarz | Trial | Narrowed down list of items we really needed exhibits for trial. | 0.60 | 550 | 330.00 | | 330.00 |
| 11/01/2024 J. Miller | Trial | Continue to draft emotional distress damages section of jury charge, frequently going back to reexamine portions of case file or to do additional research. | 8.00 | 375 | 3,000.00 | -2,000.00 | 1,000.00 |
| 11/02/2024 A. Keshavarz | Settlement | Worked further on attempts to settle the case. Finalized settlement language for the mediator. Call with mediator. | 0.80 | 550 | 440.00 | | 440.00 |
| 11/02/2024 A. Keshavarz | Trial | As case has not settled, back to working on JPTO, especially on proposed agreed facts as to dates and times of credit pulls. | 3.80 | 550 | 2,090.00 | | 2,090.00 |
| 11/02/2024 A. Keshavarz | Trial | Reached out to client to set up calls with damages witness. | 0.50 | 550 | 275.00 | | 275.00 |
| 11/02/2024 J. Miller | Trial | Finishing up work drafting emotional distress section of jury charge. | 1.60 | 375 | 600.00 | -375.00 | 225.00 |
| 11/02/2024 J. Miller | Trial | Began researching cases on willfulness and negligence standards in FCRA cases, especially in 2d Cir COA and district courts; collecting language that I might want to use in jury charge section on willfulness/negligence. | 3.80 | 375 | 1,425.00 | | 1,425.00 |
| 11/02/2024 J. Miller | Trial | Draft section of jury charge on willfulness and negligence standards for FCRA violations; drafted section on punitive damages; rearranged order of many instructions to try to give it a better flow that would make sense to non-lawyers. Emailed to AK for review | 4.20 | 375 | 1,575.00 | | 1,575.00 |

| | | | | | | | | |
|------------|--------------|------------|--|------|-----|----------|---------|----------|
| 11/03/2024 | A. Keshavarz | Trial | Revised proposed JPTO. Revised exhibit list based on call with co-co-counsel. Review of J. Miller revisions to jury charge. | 3.90 | 550 | 2,145.00 | -550.00 | 1,595.00 |
| 11/03/2024 | A. Keshavarz | Trial | Calls with damages witnesses and preparation for the same. Post witness meeting follow up. | 4.00 | 550 | 2,200.00 | | 2,200.00 |
| 11/04/2024 | A. Keshavarz | Settlement | Finally received response from opposing counsel regarding the settlement demand we made through the mediator. Research and entering a judgment with fees to be decided with a fee petition given we are within 14 days of trial and cannot accept an OOJ they might make. Worked on proposed alternative language, especially given individual practice rules regarding requirement of signed agreement before adjourning trial date and with court requiring dismissal with prejudice with maintaining jurisdiction no more than 30 days. Reviewed crash research on issue of simply entering consent judgment with fees to be decided later. | 1.20 | 550 | 660.00 | | 660.00 |
| 11/04/2024 | A. Keshavarz | Trial | Continued working on pretrials. Review and revised subpoena for custodian of business records for capital one. Reached out to in-house counsel for Capital One about missing account notes and witness for business records foundation at trial, if need be. Review and revised proposed jury charge. | 6.40 | 550 | 3,520.00 | | 3,520.00 |
| 11/04/2024 | J. Miller | Settlement | Begin research on effect of OOJ served/accepted less than 14 days before trial. Examined Judge Rakoff's individual practices on adjournment of trials for settlement; laid out issues raised by rule in relation to reserving our right to petition for attorney's fees in e-mail to co-counsel | 0.60 | 375 | 225.00 | | 225.00 |
| 11/04/2024 | J. Miller | Trial | Drafting preliminary pre-trial jury instruction, using Samms as model | 2.20 | 375 | 825.00 | | 825.00 |
| 11/04/2024 | J. Miller | Trial | Selecting general/boilerplate instructions that should be included in our jury charge, from model instructions as well as instructions given in Samms. Edited/tailored them to fit Francois. | 1.30 | 375 | 487.50 | | 487.50 |
| 11/04/2024 | J. Miller | Trial | Two Zoom calls with all co-counsel to discuss last minute attempts to settle case; discuss whether it's appropriate to serve/accept OOJ at this late date; what kind of language is appropriate for consent judgment; strategy for negotiating w/ OC | 0.50 | 375 | 187.50 | | 187.50 |
| 11/04/2024 | N. Moore | Settlement | Discussing their settlement offer | 1.00 | 100 | 100.00 | -100.00 | - |
| 11/04/2024 | N. Moore | Trial | draft subpoenas for Darline Dumel and Cap One Auto; scan and serve. | 1.70 | 100 | 170.00 | | 170.00 |
| 11/04/2024 | N. Moore | Trial | edits and changes to several trial exhibits | 2.30 | 100 | 230.00 | | 230.00 |
| 11/04/2024 | N. Moore | Trial | Zoom call/trial prep with Papito Momplaisir | 1.60 | 100 | 160.00 | | 160.00 |

| | | | | | | | | |
|------------|--------------|------------|--|------|-----|----------|-----------|----------|
| 11/05/2024 | A. Keshavarz | Settlement | Drafted proposed Consent Judgment language. Circulated to opposing counsel and mediator. Drafts back and forth with mediator. Emails throughout the day with opposing counsel and mediator with multiple drafts. | 1.90 | 550 | 1,045.00 | | 1,045.00 |
| 11/05/2024 | A. Keshavarz | Trial | In the absence of a settlement agreement, worked on proposed joint pretrial order, review and revised. Brief review of jury instruction. | 2.40 | 550 | 1,320.00 | | 1,320.00 |
| 11/05/2024 | A. Keshavarz | Trial | Call with counsel for Capital One regarding our trial subpoena. Attempted to work out agreement. Reviewed 130 pages of newly produced account activity notes that included documentation of calls. He indicated the calls may be recorded. I flagged the pages reflecting calls and asked if they could produce the recordings. These are new documents that should have previously produced in response to our subpoena | 1.60 | 550 | 880.00 | | 880.00 |
| 11/05/2024 | J. Miller | Settlement | Research for cases on effect of OOJ served or accepted within 14 days of trial; researched cases, analyzed. Not much out there. Sent to AK | 1.40 | 375 | 525.00 | | 525.00 |
| 11/05/2024 | J. Miller | Settlement | Emails to/from opposing counsel re: how to resolve issues with opposing counsel re: settlement, while complying with all Court individual rules/deadlines. | 0.50 | 375 | 187.50 | -187.50 | - |
| 11/05/2024 | J. Miller | Trial | Reviewed AM, JIJ's edits to our draft of jury instructions. Accepted almost all changes; difference of opinion on whether subjective testimony of plaintiff is enough for emotional distress damages, and on whether it's necessary to have instruction that says punitives possible even if no actuals. E-mail thread with all attorneys to settle on language. | 0.80 | 375 | 300.00 | -300.00 | - |
| 11/05/2024 | J. Miller | Trial | Review draft of proposed consent judgment prepared by AM | 0.20 | 375 | 75.00 | -75.00 | - |
| 11/05/2024 | J. Miller | Trial | Drafting sections of the joint pretrial order (joint summary, and itemization of claims/defenses). | 2.00 | 375 | 750.00 | -375.00 | 375.00 |
| 11/05/2024 | J. Miller | Trial | Finalizing proposed jury charge for submission. Finding and adding necessary general instructions. | 4.40 | 375 | 1,650.00 | -1,500.00 | 150.00 |
| 11/05/2024 | N. Moore | Settlement | Draft language for AK to send to opposing counsel RE settlement | 0.60 | 100 | 60.00 | -20.00 | 40.00 |
| 11/05/2024 | N. Moore | Trial | Research on consent order/decre | 1.10 | 100 | 110.00 | -110.00 | - |
| 11/05/2024 | N. Moore | Trial | Review and edit specfic language for proposed consent judgment. | 0.70 | 100 | 70.00 | -70.00 | - |
| 11/05/2024 | N. Moore | Trial | Research on FRCP 6 - court holiday/closure on election day and how it effects the deadline to file pre-trial motions. | 1.40 | 100 | 140.00 | | 140.00 |
| 11/06/2024 | A. Keshavarz | Trial | Calls and research regarding their late served offer of judgment, and the effect of accepting and filing given the fact that it is served within 14 days, in contravention of the text of the rule. Drafted and served acceptance of the putative offer of judgment | 6.30 | 550 | 3,465.00 | -550.00 | 2,915.00 |

| | | | | | | | | |
|------------|--------------|--------------|--|------|-----|----------|-----------|----------|
| 11/06/2024 | N. Moore | Settlement | Drafting all documents to accept offer of judgment; print, copy, scan, prepared for CMRRR mailing and sent. | 2.00 | 100 | 200.00 | | 200.00 |
| 11/06/2024 | N. Moore | Settlement | Re-drafted notice of and affirmation of mailing | 1.30 | 100 | 130.00 | -130.00 | - |
| 11/06/2024 | N. Moore | Settlement | Research on release language. | 1.50 | 100 | 150.00 | -150.00 | - |
| 11/07/2024 | A. Keshavarz | Settlement | Correspondence to Court regarding settlement and request to remove case from docket. Correspondence with counsel regarding the same. | 0.30 | 550 | 165.00 | | 165.00 |
| 11/08/2024 | J. Miller | Settlement | Research on use of mediation communications in fee petition | 2.70 | 375 | 1,012.50 | -750.00 | 262.50 |
| 11/11/2024 | J. Miller | Fee Petition | Research on hourly rates in consumer protection matters in SDNY | 7.70 | 375 | 2,887.50 | -1,500.00 | 1,387.50 |
| 11/21/2024 | A. Keshavarz | Trial | Correspondence to opposing counsel as timing of payment of judgment. | 0.10 | 550 | 55.00 | | 55.00 |
| 11/26/2024 | J. Miller | Trial | Research, analysis of hourly rates for fee petition; discuss hourly rates with/ AK | 2.10 | 375 | 787.50 | -375.00 | 412.50 |
| 12/02/2024 | J. Miller | Fee Petition | Hourly rate fee research - focus on cases suggested by AM; also focus on associate rates. | 4.80 | 375 | 1,800.00 | -375.00 | 1,425.00 |
| 12/03/2024 | J. Miller | Fee Petition | Continue to research fee awards in SDNY, broadening to all types of cases | 5.10 | 375 | 1,912.50 | -1,125.00 | 787.50 |
| 12/04/2024 | J. Miller | Fee Petition | Reviewed potential declaration. | 1.00 | 375 | 375.00 | -337.50 | 37.50 |
| 12/04/2024 | J. Miller | Fee Petition | Began drafting procedural history section of fee petition. | 4.50 | 375 | 1,687.50 | -1,315.00 | 372.50 |
| 12/05/2024 | J. Miller | Fee Petition | Draft notice of fee petition | 0.60 | 375 | 225.00 | -150.00 | 75.00 |
| 12/05/2024 | J. Miller | Fee Petition | Research for degree of success section of fee petition MOL. | 1.30 | 375 | 487.50 | | 487.50 |
| 12/06/2024 | J. Miller | Fee Petition | Research and draft memo in support of fee petition - degree of success section | 5.60 | 375 | 2,100.00 | | 2,100.00 |
| 12/09/2024 | J. Miller | Fee Petition | Draft memo in support of fee petition - degree of success section | 6.90 | 375 | 2,587.50 | -750.00 | 1,837.50 |
| 12/10/2024 | J. Miller | Fee Petition | Drafting memo in support of fee petition - degree of success section | 6.40 | 375 | 2,400.00 | -1,125.00 | 1,275.00 |
| 12/11/2024 | J. Miller | Fee Petition | Work on fee petition. Examined other examples of fee petitions. Worked on | 3.60 | 375 | 1,350.00 | -1,350.00 | - |
| 12/11/2024 | J. Miller | Fee Petition | Draft memo in support of fee petition - focus on fact section | 3.80 | 375 | 1,425.00 | -1,425.00 | - |
| 12/12/2024 | J. Miller | Fee Petition | Drafting memo in support of fee petition; focus on statement of facts | 1.00 | 375 | 375.00 | | 375.00 |
| 12/12/2024 | J. Miller | Fee Petition | Draft memo in support of fee petition; focus on section on background law on fee petitions in 2d circuit. | 2.10 | 375 | 787.50 | | 787.50 |
| 12/12/2024 | J. Miller | Fee Petition | Draft memo in support of fee petition, focusing on section on Johnson factors | 1.60 | 375 | 600.00 | | 600.00 |
| 12/13/2024 | J. Miller | Fee Petition | Drafting memo of law in support of fee petition, focusing on section on Johnson factors | 6.80 | 375 | 2,550.00 | -2,550.00 | - |
| 12/16/2024 | J. Miller | Fee Petition | Researching and drafting memo in support of Fee Petition. Focus on section on policy arguments for private FCRA enforcement. | 6.20 | 375 | 2,325.00 | -2,325.00 | - |
| 12/17/2024 | J. Miller | Fee Petition | Researching for and drafting memo of law in support of fee petition. Focused on section on importance of full fee awards in fee-shifting statutes generally. | 7.10 | 375 | 2,662.50 | | 2,662.50 |

| | | | | | | | | |
|------------|--------------|--------------|--|------|-----|----------|-----------|----------|
| 11/27/2024 | A. Keshavarz | Fee Petition | Analyzed fee records as to fees accrued by category of work in framing fee for fee petition argument. | 4.40 | 550 | 2,420.00 | | 2,420.00 |
| 11/27/2024 | A. Keshavarz | Fee Petition | Call to opposing counsel regarding settlement of fees. Left message. | 0.10 | 550 | 55.00 | | 55.00 |
| 11/27/2024 | A. Keshavarz | Fee Petition | Spoke with mediator regarding his thoughts on how to proceed with settlement on fees. | 0.10 | 550 | 55.00 | | 55.00 |
| 11/27/2024 | A. Keshavarz | Fee Petition | Call with outside counsel James Fishman on as to being declaration for fee petition and FCRA hourly | 0.80 | 550 | 440.00 | | 440.00 |
| 11/27/2024 | A. Keshavarz | Fee Petition | Worked on fee petition, research on hourly rates for FCRA cases specifically, as opposed to FDCPA. | 3.50 | 550 | 1,925.00 | -1,100.00 | 825.00 |
| 12/03/2024 | A. Keshavarz | Fee Petition | Check in with Judy Miller as to status of fee petition research as to reasonable hourly rates. | 0.80 | 550 | 440.00 | -440.00 | - |
| 12/04/2024 | A. Keshavarz | Fee Petition | Worked on overall structure of MOL for fee petition. | 1.30 | 550 | 715.00 | | 715.00 |
| 12/04/2024 | A. Keshavarz | Fee Petition | Second call to opposing counsel to discuss settlement on fee issue without necessity of filing fee | 0.10 | 550 | 55.00 | | 55.00 |
| 12/04/2024 | A. Keshavarz | Fee Petition | Worked on fee declaration | 1.40 | 550 | 770.00 | | 770.00 |
| 12/04/2024 | A. Keshavarz | Fee Petition | Reached out to experts for potential fee declaration. | 1.20 | 550 | 660.00 | | 660.00 |
| 12/04/2024 | A. Keshavarz | Fee Petition | Worked on "degree of success" issues for fee petition. | 6.80 | 550 | 3,740.00 | | 3,740.00 |
| 12/04/2024 | A. Keshavarz | Fee Petition | Emailed opposing counsel to see if they would consent to a one week extension to file the fee petit | 0.10 | 550 | 55.00 | | 55.00 |
| 12/06/2024 | A. Keshavarz | Fee Petition | For fee petition, went through argument of potential risk of no liability at all to justify degree | 1.20 | 550 | 660.00 | | 660.00 |
| 12/09/2024 | A. Keshavarz | Fee Petition | Revisions on structure of MOL. | 1.70 | 550 | 935.00 | | 935.00 |
| 12/10/2024 | A. Keshavarz | Fee Petition | Call to opposing counsel to discuss settlement on fees. Left message. | | | | | |
| 12/10/2024 | A. Keshavarz | Fee Petition | Followed up with e-mail askin | 0.10 | 550 | 55.00 | | 55.00 |
| 12/10/2024 | A. Keshavarz | Fee Petition | Worked on procedural history section of fee petition. | 1.00 | 550 | 550.00 | | 550.00 |
| 12/11/2024 | A. Keshavarz | Settlement | Research into enforcing federal court judgment as they have not paid underlying \$120,000 as it has yet be be satisfied. | 1.10 | 550 | 605.00 | | 605.00 |
| 12/11/2024 | A. Keshavarz | Settlement | Began putting together post-judgment enforcement documents, and additional research regarding the same. | 2.90 | 550 | 1,595.00 | | 1,595.00 |
| 12/13/2024 | A. Keshavarz | Settlement | Deadline for them to wire \$120,000 in settlement funds and send proof of the same having expired, completed abstract of judgment form and filed. Hours later they wired the funds and provided proof of wiring they sent. | 0.60 | 550 | 330.00 | | 330.00 |